

FEDERAL TRANSIT ADMINISTRATION

TITLE VI UPDATE

2021 - 2023

**PINELLAS SUNCOAST TRANSIT AUTHORITY
3201 SCHERER DRIVE
ST. PETERSBURG, FLORIDA 33716**

January 2021

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TABLE OF CONTENTS

INTRODUCTION	1
Policy Statement	1
TITLE VI PROGRAM CHECKLIST	3
Checklist for All Recipients	3
Checklist for Transit Providers	4
SECTION 1 – GENERAL REPORTING REQUIREMENTS.....	6
1-1. Title VI Notice to the Public	6
1-2. Title VI Compliant Procedures	8
1-3. Title VI Compliant Form	8
1-4. Record of Title VI Investigations, Complaints, and Lawsuits.....	8
1-5. Public Participation Plan	8
1-6. Language Assistance Plan	12
1-7. Minority Board Representation.....	18
1-8. Subrecipient Compliance with Title VI	19
1-9. Facility Construction Equity Analysis	19
1-10. Board Approval	20
SECTION 2 – TRANSIT AGENCY REQUIREMENTS	21
2-1. System-wide Service Standards.....	21
2-2. System-wide Service Policies.....	21
2-3. Demographic Analysis.....	21
2-4. Customer Demographics and Travel Patterns	27
2-5. Monitoring Program	28
2-6. Major Service Policy.....	34
2-7. Equity Analysis	35

APPENDICES

Appendix A – Title VI Program Standards, Policies, and Assurances.....	A-1
Appendix B – Detailed Support Information.....	B-1
Appendix C – LEP Support Information.....	C-1
Appendix D – Detailed Census Block Group – Demographic Details	D-1
Appendix E – Title VI Complaint Procedures and Form	E-1
Appendix F – PSTA Rules and Regulations	F-1
Appendix G – PSTA Board Approval	G-1
Appendix H – Service Equity Analysis & Fare Policy	H-1
Appendix I – 2017 Title VI Program Update – FTA Comments	I-1

LIST OF TABLES

Table 1 – Summary of LEP Persons within the PSTA Service Area	13
Table 2 – Community Organizations Serving LEP Persons.....	16
Table 3 – Percentage of Limited English Proficiency Students within Pinellas County Schools.....	16
Table 4 – Percentage of On-Board Spanish Version Surveys Returned	17
Table 5 – Transit Riders Advisory Committee (TRAC) Racial Composition.....	19
Table 6 – Pinellas County Population - Racial Distribution	22
Table 7 – Low-Income Population in Pinellas County.....	25
Table 8 – Weekday Service Frequency – Minority vs. Non-Minority Routes	28
Table 9 – Distribution of Amenities in PSTA Service Area	28
Table 10 – On-Time Performance Analysis	29
Table 11 – Distribution of PSTA Amenities	30
Table 12 – LEP Population in PSTA Service Area	31
Table 13 – Minority Population in PSTA Service Area.....	31
Table 14 – Low-Income Population in PSTA Service Area	31
Table 15 – Population within Three-Quarter Miles of PSTA Service Area.....	31
Table 16 – PSTA Bus Fleet.....	32
Table 17 – Maximum Load Analysis.....	33

LIST OF FIGURES

Figure 1 – PSTA Customer Service Representatives	11
Figure 2 – Distribution of LEP Persons within the PSTA Service Area	14
Figure 3 – Pinellas County Population – Racial Distribution	22

LIST OF MAPS

Map 1 – Pinellas County LEP Block Groups.....	15
Map 2 – Pinellas County Minority Census Block Groups	25
Map 3 – Pinellas County Low-Income Census Block Groups	26

INTRODUCTION

The Pinellas Suncoast Transit Authority (PSTA), as the public transit provider in Pinellas County, is required to submit to the Federal Transit Administration (FTA) a Title VI update that documents the level and quality of transit service provided for minority and low-income areas, pursuant to Title VI of the Civil Rights Act of 1964, as amended. This report is submitted every three years and is intended to demonstrate compliance with Title VI requirements that preclude discrimination in the provision of transit service and transit-related amenities.

The purpose of this plan is to assure that no persons, on the grounds of race, color, or national origin, is excluded from participating in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance from FTA. This report will provide a level of service analysis for PSTA comparing minority and non-minority Census tract samples and low income and non-low-income Census tract samples in order to assess PSTA's conformance with Title VI.

Although challenges have been encountered due to current economic conditions, funding constraints, and other externalities, PSTA's vision remains to continue to provide efficient transit service throughout the county in concert with the community vision.

POLICY STATEMENT

As a major provider of public transportation whose employees have extensive daily contact with the public, PSTA recognizes its responsibility to the community it serves and is committed to a policy of nondiscrimination. PSTA works to ensure non-discriminatory transportation in support of its mission to provide effective, coordinated, and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Pinellas County citizens.

In compliance with Title VI of the Civil Rights Act of 1964, PSTA prohibits discrimination on the basis of race, color, or national origin in its programs and activities receiving Federal financial assistance. Specifically, Title VI provides that *"no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance"* (42 U.S.C. § 2000d).

FTA issues additional guidance and instruction for complying with the Title VI regulations in circular FTA C 4702.1B. This circular states the purposes of the Title VI program:

- a) *Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;*

- b) Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;*
- c) Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.*

The Environmental Justice component of Title VI guarantees fair treatment for all people and requires PSTA to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information that PSTA provides. Environmental Justice principles require PSTA:

- a) To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.*
- b) To ensure the full and fair participation by all potentially affected communities in transportation decision-making process.*
- c) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.*

Patricia Collins, Director of Human Resources and EEO officer, has been designated as PSTA's Civil Rights Officer, responsible for civil rights compliance and monitoring to ensure the non-discriminatory provision of transit services and programs. In addition, Jacob Labutka, Project Planner, is responsible for implementing all aspects of the Title VI Program. However, along with the Chief Executive Officer, all directors, managers, and their staffs share in the responsibility for making PSTA's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by PSTA in its financial assistance agreements with the U.S. Department of Transportation (DOT).

TITLE VI PROGRAM CHECKLIST

The following checklists identify the Title VI Program reporting requirements, as described in FTA Circular 4702.1B with the associated page numbers from this report that address those requirements. The first checklist applies to all recipients of Federal funding assistance, while the second checklist refers to all fixed-route transit providers operating 50 or more fixed-route vehicles in peak service and located in an urbanized area of 200,000 or more in population.

Checklist for all Recipients:

1. Title VI Notice to the Public

Requirement: Submit a copy of the Title VI Notice to the Public, including a list of locations where the notice is posted.

Title VI Plan: Page 6

2. Title VI Complaint Procedures

Requirement: Submit a copy of the Pinellas Suncoast Transit Authority procedures for filing a Title VI complaint.

Title VI Plan: Page 8

3. Title VI Complaint Form

Requirement: Submit a copy of the Pinellas Suncoast Transit Authority form for filing a Title VI complaint.

Title VI Plan: Page 8

4. Record of Transit-Related Title VI Investigations, Complaints, and Lawsuits

Requirement: Submit a list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submittal.

Title VI Plan: Page 8

5. Public Participation Plan

Requirement: Submit information about outreach methods to engage minority and Limited English Proficiency (LEP) populations and a summary of outreach efforts made since the time of the last submittal.

Title VI Plan: Page 8

6. Language Assistance Plan

Requirement: Submit a copy of the agency's plan for providing language assistance to LEP persons, which is based on the Department of Transportation LEP guidance.

Title VI Plan: Page 12

7. Minority Board Representation

Requirement: Submit a table depicting the membership of non-elected committees and councils broken down by race and a description of the process the agency uses to encourage the participation of minorities on such committees.

Title VI Plan: Page 18

8. Subrecipient Compliance with Title VI

Requirement: Submit a description of how the agency monitors its subrecipients for compliance with Title VI and a schedule of subrecipient Title VI program submissions.

Title VI Plan: Page 19

9. Title VI Equity Analysis for Facilities

Requirement: Submit a Title VI Equity Analysis if the recipient has constructed a facility (vehicle storage facility, maintenance facility, operation center, etc.) since the time of the last submittal.

Title VI Plan: Page 19

10. Board Approval of Title VI Documentation

Requirement: Submit a copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or officials responsible for policy decisions reviewed and approved the Title VI Program.

Title VI Plan: Page 20

Checklist for Transit Providers Operating 50 or More Fixed-Route Vehicles in Peak Service and Located in an Urbanized Area of 200,000 or More in Population:**1. Service Standards**

Requirement: Submit the agency's system-wide service standards by mode for vehicle load, vehicle headway, on-time performance, and service availability.

Title VI Plan: Page 21

2. Service Policies

Requirement: Submit the agency's system-wide policies by mode for distribution of transit amenities and vehicle assignment.

Title VI Plan: Page 21

3. Demographic Analysis

Requirement: Submit a demographic analysis of the transit provider's service area, including demographic maps and charts.

Title VI Plan: Page 21

4. Customer Demographics and Travel Patterns

Requirement: Submit passenger demographic data and travel patterns collected from passenger surveys.

Title VI Plan: Page 27

5. Monitoring Program

Requirement: Submit the results of the monitoring program of service standards and policies and any action taken to verify Board approval of the monitoring results.

Title VI Plan: Page 28

6. Major Service Policy

Requirement: Submit a description of the public engagement process for setting the “major service change policy” and disparate impact policy, with verification of Board approval of those policies.

Title VI Plan: Page 34

7. Equity Analysis

Requirement: Submit the results of any equity analysis for any major service changes and/or fare changes implemented since the last Title VI Program submission, with verification of Board approval of the equity analysis for any service or fare changes.

Title VI Plan: Page 35

SECTION 1 – GENERAL REPORTING REQUIREMENTS

The following information addresses Title VI general reporting requirements as described in FTA Circular 4702.1B.

1-1. TITLE VI NOTICE TO THE PUBLIC

Requirement: Submit a copy of the Title VI Notice to the Public, including a list of locations where the notice is posted.

PSTA's Notice to the Public (see text below) informing them of their rights under Title VI of the Civil Rights act is posted in English and Spanish on all buses throughout the fleet. It is also posted in the PSTA lobby. A copy of the notification is available on our website, www.psta.net/title6.php.

PINELLAS SUNCOAST TRANSIT AUTHORITY OBJECTIVES/POLICY STATEMENTS (42 U.S.C. 2000d) TITLE VI OF THE CIVIL RIGHTS ACT TO ALL PSTA EMPLOYEES AND THE SERVICE COMMUNITY

As a major provider of public transportation whose employees have extensive daily contact with the public, the Pinellas Suncoast Transit Authority (PSTA) recognizes its responsibility to the community it serves and is committed to a policy of nondiscrimination. PSTA works to ensure nondiscriminatory transportation in support of our mission to provide effective, coordinated, and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Pinellas County citizens.

In compliance with Title VI of the Civil Rights Act of 1964, PSTA prohibits discrimination on the basis of race, color, age, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d)

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for PSTA to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information PSTA provides.

Environmental Justice Principles are:

- a) To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- b) To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process;
- c) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations

Patricia Collins, Director of Human Resources and EEO officer, has been designated as PSTA's Civil Rights Officer, responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services and programs. In addition, Jacob Labutka, Project Planner, is responsible for implementing all aspects of the Title VI Program. However, along with the Chief Executive Officer, all Directors, Managers, and their Staff share in the responsibility for making PSTA's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by PSTA in its financial assistance agreement with DOT.

To request a copy of this agency's Title VI program contact PSTA. Any person who believes they have been discriminated against under Title VI has the right to file a formal complaint within 180 days of the alleged discrimination. Individuals and organizations may file a complaint with Pinellas Suncoast Transit Authority by contacting PSTA or obtaining the complaint form from:

www.psta.net/PDF/titlevi_complaintform.pdf.

The form should be completed, signed, and sent to:

Planning Department
Pinellas Suncoast Transit Authority
3201 Scherer Drive
St. Petersburg, FL 33716
Email: Title6Coordinator@psta.net
Phone: (727) 540-1800

Individuals or organizations with questions, comments, or for more information may contact PSTA at the above address.

Persons may also file a complaint with the Federal Transit Administrator's Office of Civil Rights by obtaining the complaint form from:

http://www.fta.dot.gov/civilrights/12328_5104.html.

1-2. TITLE VI COMPLAINT PROCEDURES

Requirement: Submit a copy of the Pinellas Suncoast Transit Authority procedures for filing a Title VI complaint.

In ensuring that no person is excluded from participation in, or denied the benefits of, its transit program, policy or activity on the basis of race, color or national origin, PSTA has developed procedures for investigating and tracking Title VI complaints, as shown in Appendix E. The complaint procedures provide instructions on how persons may file a Title VI complaint in the event they have been discriminated against.

Any person who believes that they have been discriminated against under Title VI has the right to file a formal complaint within 180 days of the alleged discrimination. Individuals and organizations may file a complaint with PSTA by obtaining the complaint form from PSTA (see Appendix E).

1-3. TITLE VI COMPLAINT FORM

Requirement: Submit a copy of the Pinellas Suncoast Transit Authority form for filing a Title VI complaint.

A copy of PSTA's Title VI complaint form is provided in Appendix E. Copies of the form may be obtained from PSTA.

1-4. RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Requirement: Submit a list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submittal.

There are no lawsuits or complaints alleging that PSTA discriminates on the basis of race, color, or national origin with respect to service or other transit benefits.

1-5. PUBLIC PARTICIPATION PLAN

Requirement: Submit information about outreach methods to engage minority and Limited English Proficiency (LEP) populations and a summary of outreach efforts made since the time of the last submittal.

PSTA has an ongoing outreach program that it implements on an annual basis. Ongoing outreach is augmented by recurring public outreach activities in support of specific projects. Since the last Title VI Program Update in 2017, PSTA has conducted outreach to a number of new services, including a new

“limited express” service to add more frequency during the peak on the highest ridership route in the system with a goal to do the same with more routes. PSTA also conducted outreach associated with the expansion of its innovative mobility programs, including a new Mobility on Demand program for paratransit service customers (door-to-door trips on demand without reserving in advance), the new TD Direct Connect program (higher subsidy of \$9 for rides to or from designated bus stops) for riders in the Transportation Disadvantaged (TD) program, and an increase in the number of Direct Connect locations across the county to improve access to PSTA’s bus system. PSTA also finalized design of the SunRunner BRT line and began construction in August 2020. In support of the BRT, PSTA has also been conducting a TOD planning and business assistance study with a significant outreach component, including targeted outreach to minority and LEP populations and businesses.

The PSTA public engagement team conducts route specific outreach and rider surveys on PSTA buses and at PSTA transit centers and terminals for major service adjustments involving significant route changes.

Within the last 3 years, PSTA has conducted How-to-Ride presentations in high minority and LEP communities in coordination with social service providers and advocacy groups such as the Homeless Leadership Alliance, Hispanic Outreach Center, Juvenile Welfare Board, Rainbow Village, and the Boley Centers. PSTA participates in community events across Pinellas County, providing information about mobility programs in addition to fixed route bus service. Through regular and targeted outreach, PSTA reached over 20,000 people within Title VI designated areas and routes since 2018.

- **Ongoing Outreach**
 - **Community Presentations and Local Public Involvement Programs:** Planning/outreach staff provides special presentations to various groups in the community with respect to PSTA service and programs. Life skills presentations for bus travel are provided, particularly for supported employment and rehabilitation programs.
 - **Universal & Corporate Pass Program:** Beginning in 2014, PSTA began working with various partners in the implementation of the Universal Pass Program (UPASS). In this program, PSTA charges an employer or institution a negotiated rate for the entire year allowing employees or students to use an ID badge as their transit pass.
 - **Speakers Bureau “How-to-Ride” Service:** The PSTA Public Engagement staff offers presentations to community groups regarding the role of PSTA as a transportation provider, route and schedule information, and fare options. With the How-to-Ride program, new riders are escorted on a complete round-trip that includes route schedules, fare information, and travel tips.
 - **Travel Training Program:** Travel training is offered by PSTA to persons with disabilities so they can gain the skills, knowledge, and confidence necessary for independent travel. PSTA staff serves in the capacity as travel trainer and works with individuals as they learn to

navigate the regular bus system. New communication systems are also available for low vision, blind, and deaf-blind passengers to assist with identifying bus routes. Using the Bus Identifier Kit, passengers can prepare a hand-held sign with the number of the bus route on which they want to travel. Use of this kit alerts the bus operator as to the specific bus route the waiting passenger wishes to board. Development of this program included assistance from local disability groups and organizations. These organizations also refer passengers to PSTA for travel training.

- **Transit Riders Advisory Committee (TRAC):** The TRAC is composed of transit riders, defined as using transit at least two days per week. The TRAC helps PSTA improve transit services and programs by advising PSTA's transit staff, Board of Directors, and the Board's Planning Committee. The committee's role is to provide suggestions regarding issues relating to the quantity and quality of fixed-route and paratransit services.
- **Metropolitan Planning Organization (MPO) Committee Outreach Cooperation:** Staff regularly attends the monthly meeting of Forward Pinellas (the MPO for Pinellas County) and the following Forward Pinellas sub-committees to provide updates on PSTA plans and activities:
 - Bicycle Pedestrian Advisory Committee (BPAC),
 - Local Coordinating Board (LCB),
 - Planners Advisory Committee (PAC),
 - Citizens Advisory Committee, and
 - Technical Coordinating Committee (TCC).
- **PSTA Web Page:** PSTA.net handles more than 1,535,474 hits per year. The site is regularly updated with passenger information, minutes of the monthly Board meeting, special events, employment opportunities, planning documents, and financial reports. Surveys also have been provided where the public can provide feedback on proposed service modifications and route performance. Trip planning is also now available 24 hours a day, 7 days a week through the PSTA website or by using Google Transit or Transit app, and PSTA has extended web access to its services via a number of social networking websites including Facebook, Twitter, Instagram, YouTube, Blogs, and LinkedIn.
- **Social Media:** PSTA engages with passengers and other members of the public via social media on Twitter, Facebook, Instagram, YouTube, Blogs, and LinkedIn. At the end of September 2020, PSTA had 3,616 Twitter followers, 10,969 Facebook Fans, 1,195 Instagram followers, 488 YouTube followers, and 1,382 LinkedIn Followers. PSTA has an outreach program through Twitter (@pstaaalerts) designed to provide quick alerts, detours, and updates on PSTA's bus services system-wide.
- **Service Requests and Programmed Service Improvements:** The PSTA website is designed to accept requests for new and improved transit services from passengers. Each request is reviewed by staff and a written or verbal response is provided to the passenger. Requests can also be made via Customer Service during business hours or by regular mail.

- **Public Comment Opportunities:** Each PSTA Board meeting includes an open forum where comments are received with respect to discussion topics not on the Board Agenda. Before the Board votes on any action item, public input is also solicited. A public hearing requires 15 days public notice. The timing and number of public hearings required for particular actions is detailed in PSTA's Rules and Regulations found in Appendix F. Actions that require public hearings include fare changes, system-wide service changes, budget approvals, and non-system-wide service changes that affect more than 25 percent of the transit route miles, revenue vehicle miles, or ridership.
- **Schedule Outlets:** The PSTA Customer Service Department serves 15 locations by providing route schedules and system maps. These locations include welcome centers, governmental offices, and tourist attractions.
- **Bus Information:** Each bus has interior advertising cards that address topics such as passenger seating and assistance, fares, the Employer's Choice Program, the Emergency Ride Home Program, service improvements, and PSTA Board meetings.
- **Customer Service:** The PSTA information line receives more than 1,246 calls per week Monday through Saturday, and more than 427 calls on Sundays. Customer service personnel staff offices at Park Street Terminal, Grand Central Station, Pinellas Park Transit Center, and Williams Park where bus passes are sold, route and schedule information are available, and assistance is provided for passenger questions and concerns. Customer service representatives can assist customers in English or Spanish.



Figure 1: PSTA Customer Service Representatives

- **Community Programs:** Staff participates in education programs, including new rider assistance for supported employment and social service programs.
- **Bus Operations:** Each bus operator receives customer service training and uses a form known as "From the Driver Seat." This form provides an opportunity to document passengers' complaints, concerns, or requests, as well as issues that arise during daily service provision (e.g., proposed passenger amenities, damaged bus stops, additional areas of concern, etc.). Supervisors review these forms and forward to the appropriate person or department for further review, investigation, and action.
- **Surveys:** PSTA uses surveys as a tool to collect and analyze commuter behavior, comments and suggestions about services and programs provided by PSTA. Surveys are conducted in

person on bus routes, at transfer centers and at community outreach events (pre-COVID) and via survey monkey with links to the surveys distributed by text message, social media, email, and the PSTA website. Through these methods, PSTA aims to reach as broad of audience as possible. PSTA evaluates the demographics of survey respondents to ensure they are representative of PSTA's ridership.

- **Outreach Exhibits:** PSTA participates in various community events with PSTA staffing a table/booth where they can to engage with interested citizens in one-on-one discussion. Staff share information about PSTA services, specific programs/projects, answer questions, distribute promotional giveaways, and encourage follow-up how-to ride training sessions, as appropriate.
 - **Marketing Materials:** PSTA has several marketing materials such as brochures, schedules, factsheets, palm cards, and promotional giveaways to promote programs.
 - **Media Outreach:** PSTA routinely issues press releases and shares information on new programs with the media to help expand the reach to a broader market.
- Staff Events:** Outreach staff conducts "in-reach" to educate PSTA front-line employees such as bus operators and customer service representatives about new services and programs and how to use them so that they can in turn educate and inform riders.

Title VI Program Update Public Notice

For the Title VI Program Update required every three years by FTA, PSTA will include the document on the agenda of a regularly scheduled public meeting and publicize the meeting in its normal fashion. PSTA will also seek approval from its Board of Directors during a regularly scheduled meeting that was publicized in its normal fashion.

Major Service Change Public Notice

PSTA's policy requires that any time a fare increase or Major Service Change that results in a 25% or more decrease of the transit route miles, revenue miles or ridership, a public hearing is required. Prior to the public hearing, PSTA will make its equity analysis available to the public. Notice for the public hearing will be provided in accordance with Section 2.10B of PSTA's Rules and Regulations (provided in Appendix F).

1-6. LANGUAGE ASSISTANCE PLAN

Requirement: Submit a copy of the agency's plan for providing language assistance to LEP persons, which is based on the Department of Transportation LEP guidance.

LANGUAGE ASSISTANCE PLAN

PSTA has completed the following language assistance assessment and gathered data to gain an understanding of the use of public transportation by LEP persons in Pinellas County.

- **Factor 1:** The number and proportion of LEP persons served or encountered in the eligible service population.
- **Factor 2:** The frequency with which LEP individuals come into contact with the transit agency's programs, activities, and services.
- **Factor 3:** The importance to LEP persons of the transit agency's programs, activities, and services.
- **Factor 4:** The resources available to the grant recipient and costs.

The following LEP implementation plan is based upon the aforementioned needs assessment and includes LEP outreach tasks identified through the four-factor analysis that was performed by PSTA.

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

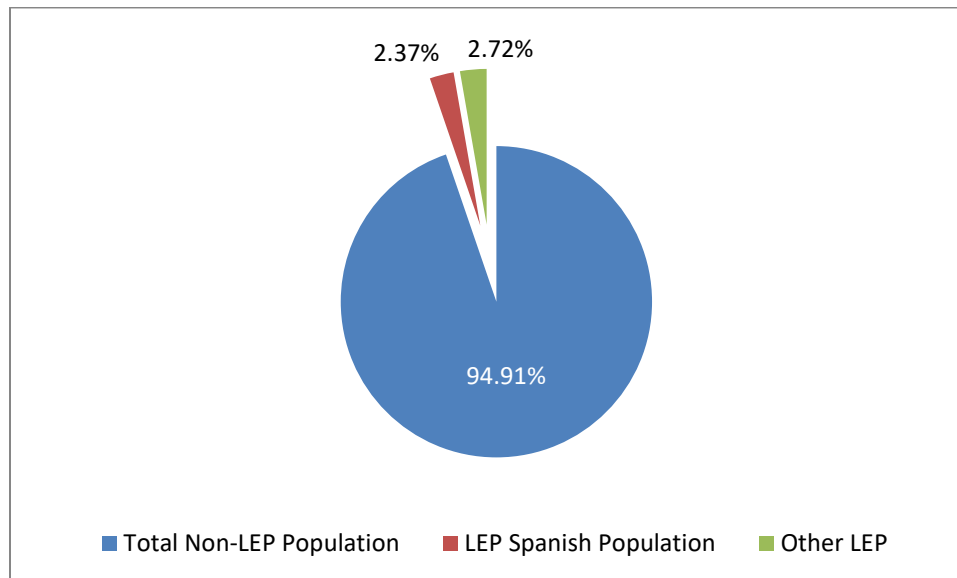
The number and proportion of LEP persons within the PSTA service area was assessed using the 2014-2018 American Community Survey (ACS) estimates. The 2014-2018 ACS data was reviewed to determine the number of people who speak English "very well" and "less than very well" for each Block Group within the PSTA service area. Figure 2 provides a breakdown of LEP persons¹ in Pinellas County. As seen in Table 1 and Figure 2, 5.09 percent of the total population above five years old within PSTA's service area is LEP, with 2.37 percent of the total population above five years old being Spanish LEP.

Table 1: Summary of LEP Persons within the PSTA Service Area

LEP Category	Population	% of Total Population
Spanish	21,270	2.37%
Other	24,883	2.72%
Total LEP	46,403	5.09%
Total Block Groups	915,240	100.00%

Source: 2014-2018 American Community Survey Five-Year Estimates

¹ The LEP counts include only the population 5 years of age and over.

Figure 2: Distribution of LEP Persons within the PSTA Service Area

Source: 2014-2018 American Community Survey Five-Year Estimates

The geographic boundaries of the PSTA service area and the existing routes, transit hubs, major transfer centers, and regional malls are presented in Map 1. All Block Groups with an LEP population percentage above the Pinellas County average (5.09%) are depicted in green. Appendix C, Table C-1 provides additional details about the LEP distribution by block group.

Table 2 presents a list of community organizations that serve LEP persons within the PSTA service area. These organizations have the ability to confirm the statistical analysis completed using Census data and also provide information that may not have been collected by the U.S. Census Bureau.

Map 1: Pinellas County LEP Block Groups

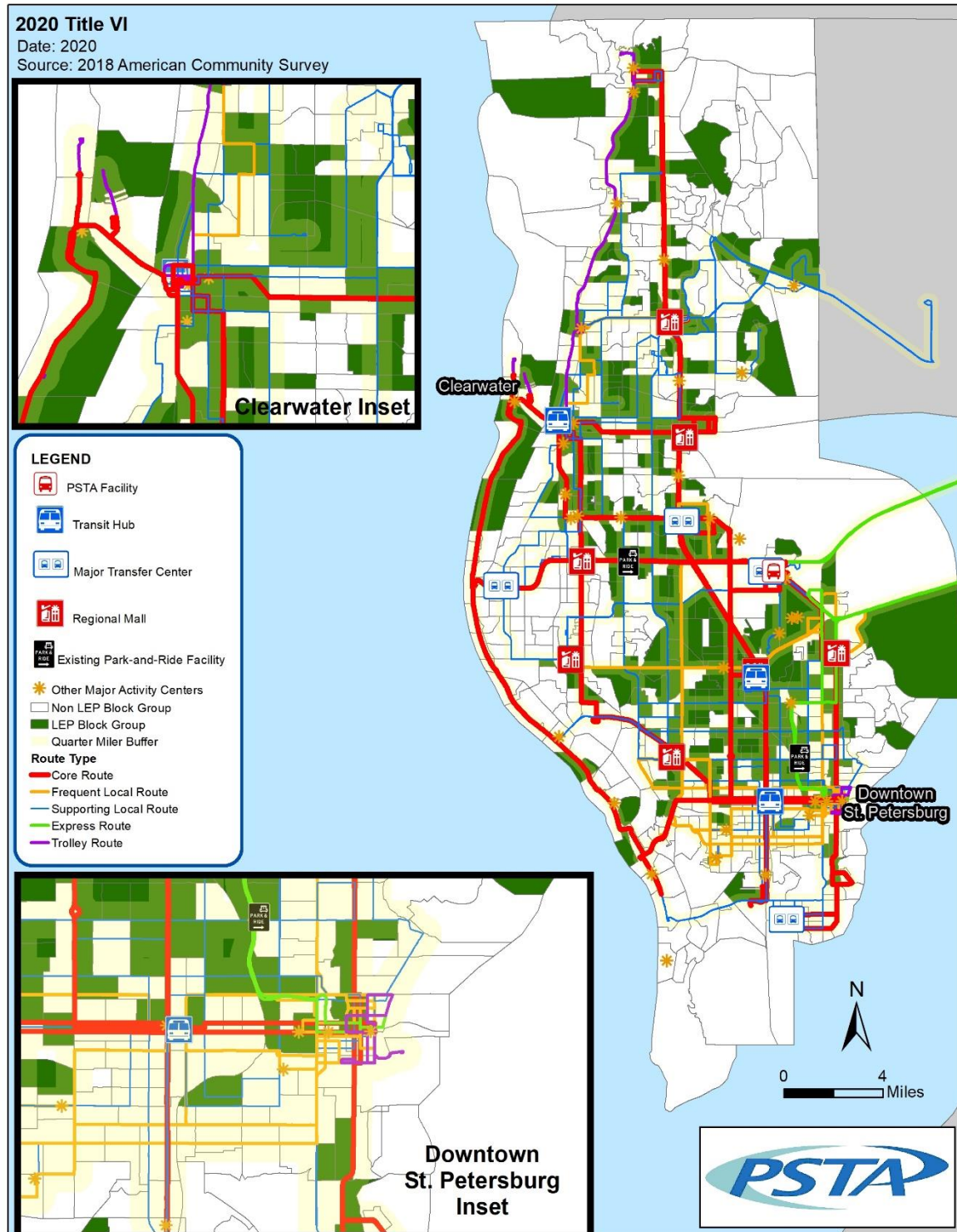


Table 2: Community Organizations Serving LEP Persons

LEP Category
Pinellas County Schools
Rotary
Kiwanis
Council of Neighborhood Associations
Various veteran groups
Various retirement/senior communities
Community Centers (such as Enoch Davis)
Libraries
Senior Centers
County and Municipal Governments
Community Groups such as the Greater Ridgecrest
Area Youth Development Initiative
Hispanic Outreach Center
The Salvation Army
Advocacy organizations for the handicapped (such as AFIRE and PAR)
The Urban League
Law Enforcement, Fire and Emergency Response organizations
Juvenile Welfare Board
Environmental Advocacy Groups
Cycling Advocacy organizations
Local Planning organizations
Hospitals
Hospice
Medical Facilities
Educational institutions of all levels

Source: Manual de Recursos for all Spanish organizations

In addition to Census data and community organizations, an effort will continue to be made to gather statistics from Pinellas County Schools regarding the total number of students enrolled in English for Speakers of Other Languages (ESOL) classes. During the 2018-19 school year, 7.6 percent of Pinellas County students were considered LEP students. See Table 3.

Table 3: Percentage of Limited English Proficiency Students within Pinellas County Schools

Total PCS Student Population	Total LEP Student Population	Percentage of LEP Students
101,427	7,735	7.6%

Source: Pinellas County School Board, 2019

Factor 2: The frequency with which LEP individuals come into contact with the transit agency's programs, activities, and services.

In order to understand the frequency with which LEP individuals come into contact with transit agency services, PSTA reviewed the number of surveys returned in Spanish or other language during their last on-board survey in 2018. Of the 5,124 surveys returned, 64 surveys or 1.2 percent were returned in Spanish or other languages. See Table 4. This gives a rough idea of the number of LEP individuals using PSTA services, at least those who speak Spanish or other language.

Table 4: Percentage of On-Board Spanish and other language Version Surveys Returned

Total On-Board Respondents	Spanish or other language Surveys Returned	Percentage of Spanish or other language Surveys Returned
5,124	64	1.2%

Source: PSTA 2018 On-Board Survey

Factor 3: The importance to LEP persons of the transit agency's programs, activities, and services.

PSTA recognizes the importance of providing public transportation to LEP persons and the consequences associated with language barriers. PSTA understands that barriers limiting a LEP person's ability to effectively use public transportation can limit his or her ability to obtain healthcare, education, or employment, and as such, has determined that providing meaningful LEP services is crucial.

Factor 4: The resources available to the grant recipient and costs.

Given PSTA's understanding of the importance of language assistance to those who need it, PSTA has undertaken several activities to assist LEP individuals. Due to the predominance of the LEP population being Spanish speaking, PSTA has put more resources into Spanish-language resources than other languages.

Language assistance measures identified through the application of the four-factor framework include the following:

- **Printed Materials:** To accommodate Spanish-speaking residents, the system map, fare brochure, and on-board surveys are translated into Spanish as needed. In addition, the website, system maps, fare brochures, on-board surveys, and public notices are translated into Spanish.
- **Google Translate:** Currently, the PSTA website provides all direct website information in 80 different languages using the Google Translator plugin.
- **Customer Service Representatives:** PSTA currently provides bilingual Customer Service (both call center and transit center booths) and front desk reception to accommodate the high number of Spanish LEP customers and residents in Pinellas County.

- **Show Me Program:** PSTA continues to participate in the “Show Me” program, which partners with organizations that cater to non-English speaking residents. The “Show Me” program coordinates a translator for residents needing a translator for less commonly spoken languages.

PSTA cannot precisely calculate the cost of these activities due to the integrated nature of these services. Because of the demand for Spanish language services, PSTA does not outsource them, but rather meets the demand with in-house staff. PSTA has made efforts to ensure that it has bilingual staff to serve the needs of its customers.

1-7. MINORITY BOARD REPRESENTATION

Requirement: Submit a table depicting the membership of non-elected committees and councils broken down by race and a description of the process the agency uses to encourage the participation of minorities on such committees.

PSTA’s Board of Directors is composed of elected and/or appointed officials. The selection process by which a member comes to serve on the Board is not under the control of PSTA and therefore the races of those members are not reported here.

PSTA’s Transit Riders Advisory Committee consists of a cross section of riders who live throughout the County. The purpose of the Committee is to provide insight and recommendations to the PSTA Board of Directors and its committees (as appropriate) on operational and transit service issues. The Committee is comprised of members from the public. In selecting members, PSTA considers both racial and geographic diversity to ensure the committee is representative of Pinellas County based on the most recent United States Census Data.

Committee members will:

1. Provide knowledge of the transit system and related overall community needs and values;
2. Provide comments on capital and operating projects based on their knowledge and use of public transit;
3. Promote better public dissemination of general information about PSTA;
4. Provide insight on various planning efforts (such as the PSTA Transit Development Plan; and new programs such as Direct Connect).

The representation consists of 13 transit users (defined by at least two (2) trips per week) selected to reflect the diversity and geographic distribution of county residents:

- Two representatives from North County, three from Mid-County, three from South County and one from the Beach Communities

- One DART user
- One student
- One professional in the field of engineering, architecture, planning, legal business, finance, environmental, marketing or public relations, or similar.

The racial composition of this committee is shown in Table 5. PSTA will continue to recruit new members so the committee better reflects the racial composition of Pinellas County.

Table 5: Transit Riders Advisory Committee (TRAC) Racial Composition²

	WHITE	AFRICAN AMERICAN	HISPANIC	OTHER
Population of Pinellas County	74.3%	10.01%	9.43%	6.26%
Transit Riders Advisory Committee	14 (82%)	1 (6%)	0 (0%)	2 (12%)

Source: 2014-2018 American Community Survey Five-Year Estimates, PSTA 2020

1-8. SUBRECIPIENT COMPLIANCE WITH TITLE VI

Requirement: Submit a description of how the agency monitors its subrecipients for compliance with Title VI and a schedule of subrecipient Title VI program submissions.

PSTA is currently not responsible for any subrecipient reporting.

1-9. FACILITY CONSTRUCTION EQUITY ANALYSIS

Requirement: Submit a Title VI Equity Analysis if the recipient has constructed a facility (vehicle storage facility, maintenance facility, operation center, etc.) since the time of the last submittal.

PSTA has not constructed any “facilities,” such as a vehicle storage facility, maintenance facility, or operations center that would qualify as a “facility” for the purposes of Title VI of the Civil Rights Act of 1964, since the last program submission.

² PSTA received a limited number of applications for the TRAC committee in 2020, in part due to the COVID-19 pandemic. Racial composition data is based on self-identification information from TRAC applications. The agency will seek to increase the racial diversity of the committee in future recruitment cycles.

1-10. BOARD APPROVAL

Requirement: Submit a copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or officials responsible for policy decisions reviewed and approved the Title VI Program.

The PSTA Board of Directors approved its previous Title VI report at its January 29, 2018 meeting. The minutes are attached in Appendix G. PSTA is anticipated to approve the 2020 Title VI Program Update at its board meeting in January 2021.

SECTION 2 – TRANSIT AGENCY REQUIREMENTS

Chapter IV of FTA Circular 4702.1B provides program-specific guidance for recipients that operate 50 or more fixed-route vehicles in peak service and are located in an Urbanized Area of 200,000 or more in population. These program-specific requirements should be followed in addition to the general reporting requirements outlined previously. The following information addresses Title VI program-specific requirements as described in FTA Circular 4702.1B.

2-1 SYSTEM-WIDE SERVICE STANDARDS

Requirement: Submit the agency's system-wide service standards by mode for vehicle load, vehicle headway, on-time performance, and service availability.

PSTA's service standards related to vehicle load, vehicle headway, on-time performance, and service availability are provided in Appendix A.

2-2 SYSTEM-WIDE SERVICE POLICIES

Requirement: Submit the agency's system-wide policies by mode for distribution of transit amenities and vehicle assignment.

PSTA's service policies related to the distribution of transit amenities and vehicle assignment are provided in Appendix A.

2-3 DEMOGRAPHIC ANALYSIS

Requirement: Submit a demographic analysis of the transit provider's service area, including demographic maps and charts.

Transit providers in metropolitan areas that receive FTA capital, operating, or planning assistance are required to prepare specific demographic and service profile maps and charts. This information is to be updated at least every three years based upon the most recent U.S. Census data. The 2014-2018 ACS was used to map the minority and low-income³ populations throughout the PSTA service area.

MINORITY POPULATIONS

According to the 2014-2018 ACS five-year estimates, the total population of Pinellas County is 957,975. Approximately 74 percent of the population is Caucasian, 10 percent is African-American, 9.4 percent

³ Low-income is defined as the population below the poverty level as estimated in the 2009-2013 American Community Survey.

Hispanic, and the remaining 6.6 percent represents other minority groups, see Figure 3 and Table 6 below.

Figure 3: Pinellas County Population - Racial Distribution (2014-2018 ACS 5-year estimates)

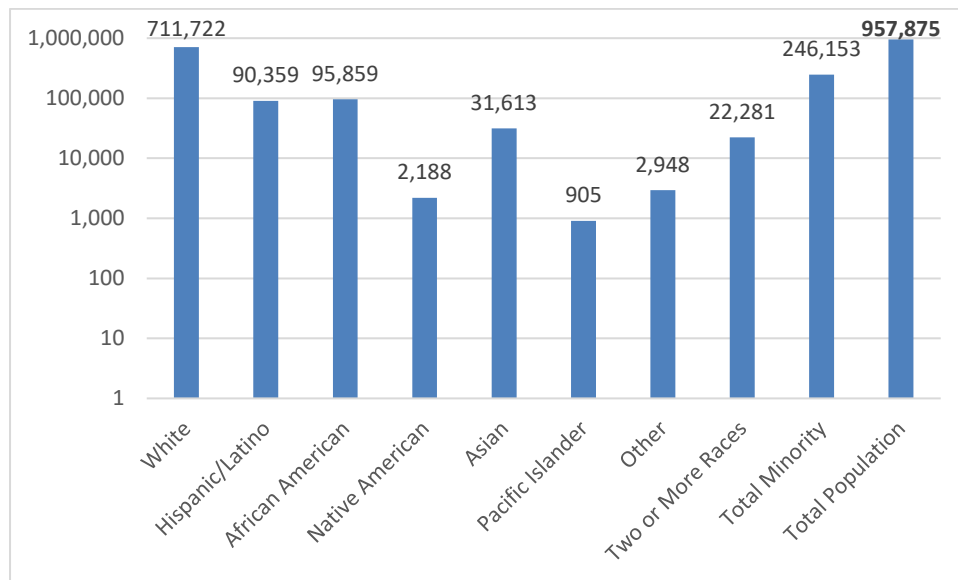


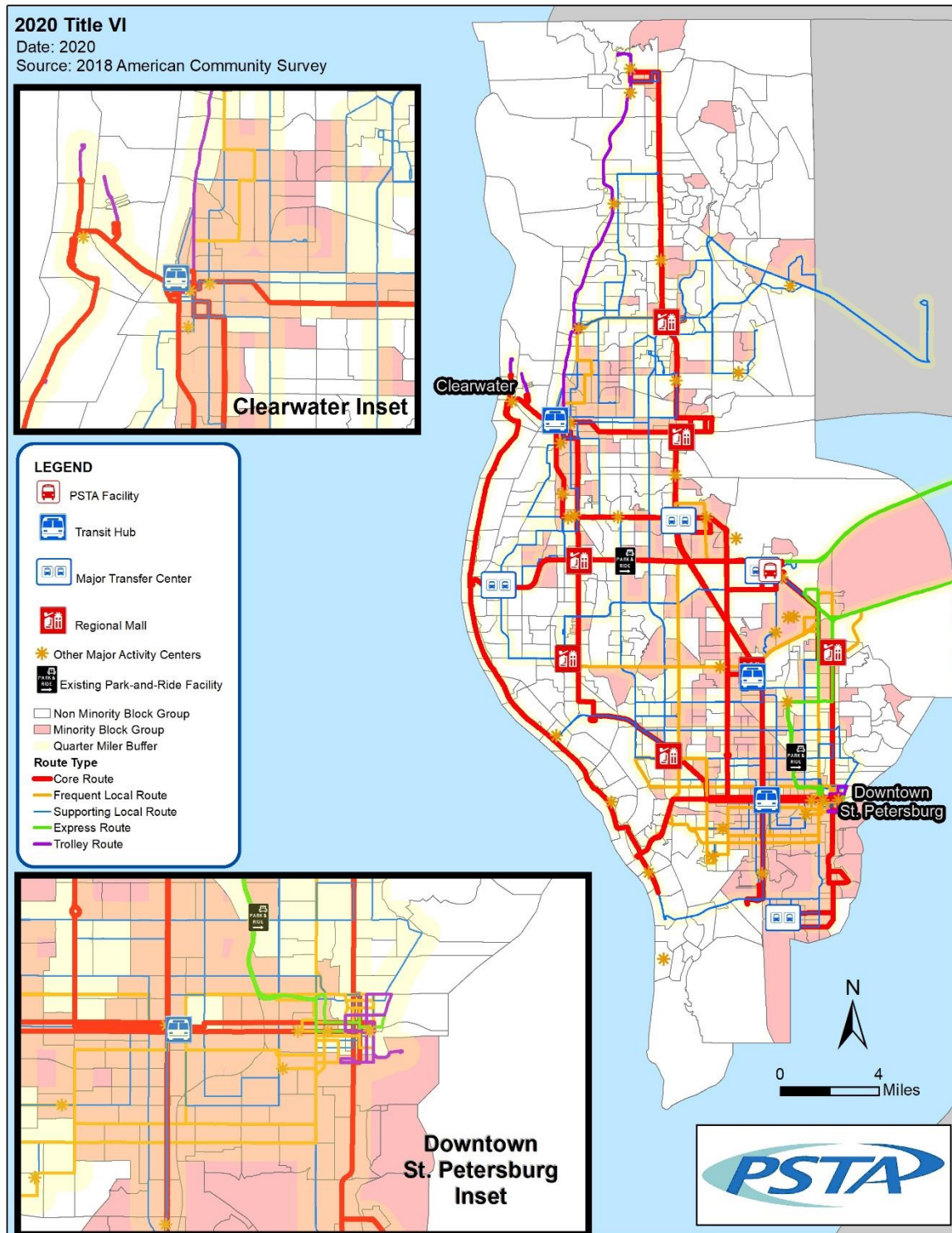
Table 6: Pinellas County Population - Racial Distribution (2014-2018 ACS 5-year estimates)

Race	Population	Percent of Total Population
White	711,722	74.3%
Hispanic/Latino	90,359	9.43%
African American	95,859	10.01%
Native American	2,188	0.23%
Asian	31,613	3.3%
Pacific Islander	905	0.09%
Other	2,948	0.31%
Two or More Races	22,281	2.33%
Total Minority	246,153	25.7%
Total Population	957,875	100.00%

Map 2 identifies Census block groups in Pinellas County, as well as existing transit routes, transit facilities, and major activity centers. Map 2 shows minority designations at the Census block group level using 2014-2018 ACS data from the US Census Bureau. A block group is identified as a minority block group when the percentage of minority people living in that block group exceeds the average minority population for the county (25.7%).

There are 257 minority Census block groups in Pinellas County. Collectively, these minority Census block groups comprise 36 percent of the 719 total Census block groups in Pinellas County. A detailed list of all Pinellas County minority Census block groups can be found in Appendix D, Table D-1.

Map 2: Pinellas County Minority Census Block Groups



LOW-INCOME POPULATIONS

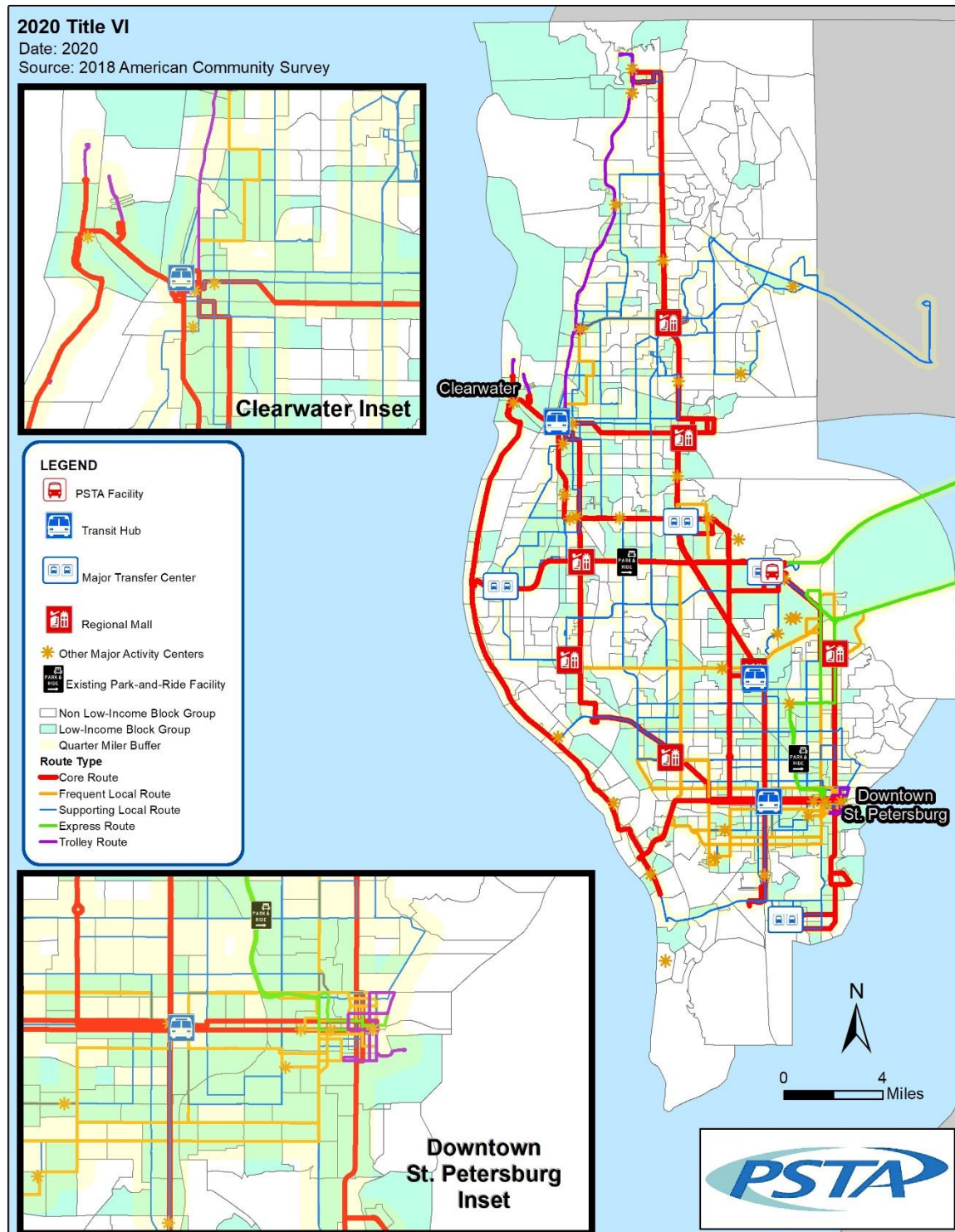
A similar analysis was conducted for low-income populations. Table 7 provides a summary of the low-income population (persons) in Pinellas County while Map 3 displays them. Block groups in Pinellas County were identified as low income if they had a percent of low-income people above the County average of 13.0 percent. Appendix B, Table B-5 and Figure B-1, present household income distribution based on PSTA's 2018 On-Board Survey data.

Using this methodology, 278 low-income Census block groups can be identified in Pinellas County. Collectively, these low-income Census block groups comprise 39 percent of the 719 total Census block groups in Pinellas County.

Table 7: Low Income Population in Pinellas County

Total Population	957,875
Low-Income Population	124,955
Percent of Low-Income Population	13.0%

Source: 2014-2018 American Community Survey Five-year Estimates

Map 3: Pinellas County Low-Income Census Block Groups

2-4 CUSTOMER DEMOGRAPHICS AND TRAVEL PATTERNS

Requirement: Submit passenger demographic data and travel patterns collected from passenger surveys.

In addition to gathering demographic data, PSTA also reviewed data from recent surveys. In Spring 2018, an on-board survey was conducted on PSTA buses as a part of a comprehensive transit market assessment and consumer research study to provide recommendations associated with the PSTA Community Bus Plan. A summary of demographic data, especially data related to race and income, is provided below.

- The majority of sampled riders are Caucasian (53.7%), 32.9 percent are African-American, and 7.8 percent are Hispanic.
- Of respondents, 24.3 percent earn less than \$10,000 per year, 66.9 percent earn between \$10,000 and \$50,000, and 4.2 percent earn over \$50,000 per year.
- Of respondents, 61 percent ride the bus at least 5 days a week.
- Of those surveyed, males made up 54.2 percent of respondents and females 45.6 percent.
- Without transit, 24.6 percent of passengers would not make their trip at all.
- Based on the survey, 38.8 percent of respondents do not regularly look up information or schedules, as the trip is part of the regular commute. Just over 13.1 percent of respondents prefer to receive information about PSTA services and programs through the PSTA website. Approximately 9.0 percent prefer to get information through printed schedules.
- 28.2 percent of riders surveyed pay by cash fare, followed by 31-Day and all-day passes at 17.4 percent and 15.7 percent respectively.
- In measuring weekday Trip Purpose, 37.9 percent of respondents were shown to be traveling from Home to Work.

2-5 MONITORING PROGRAM

Requirement: Submit the results of the monitoring program of service standards and policies and any action taken to verify Board approval of the monitoring results.

VEHICLE HEADWAY ANALYSIS

Table 8 examines weekday service frequencies for minority and non-minority routes. Routes were identified as Minority Routes if greater than one-third of the route's directional miles directly serve (through or adjacent) minority block groups. Minority block groups are defined as block groups with greater than the Pinellas County average of minority population. Full details on the Minority Route, including directional route miles, and percent minority can be found in in Appendix B, Table B-1.

As Table 8 shows, PSTA provides more than half of its service on Minority Routes, with 62 percent of its routes considered to serve minority areas. PSTA's most frequent routes (i.e., under 30 minutes) are mostly minority routes.

Table 9 provides an overview of the distribution of PSTA service throughout the week. Details on PSTA's routes, including type, headways, service span, revenue miles, and ridership can be found on Appendix B, Table B-2 and B-4. Minority Routes receive more service on weekdays and weekends than non-Minority Routes.

Table 8: Weekday Service Peak Frequency – Minority vs. Non-Minority Routes

	<30 Min.	30-59 Min.	60+ Min.	Total
Minority Routes	7	10	11	28
Non-Minority Routes	1	5	11	17
Minority Percent of Total	87.5%	66.7%	50%	62.2%
Non-minority Percent of Total	12.5%	33.3%	50%	37.8%

Source: PSTA, October 2019 – February 2020 Service Period

Table 9: Distribution of PSTA Service

	Weekday Service	Saturday Service	Sunday Service
Minority Routes	28	25	22
Non-Minority Routes	17	15	9

Source: PSTA, October 2019 – February 2020 Service Period

ON-TIME PERFORMANCE ANALYSIS

On-time performance is the time deviation of actual operating time from the published schedule. PSTA buses are considered on-time if the scheduled time is no more than 0 seconds before actual departure and no more than 4 minutes and 59 seconds (the on-time window) past the scheduled time of departure. PSTA's on-time performance goal for its bus service is 75 percent.

Table 10 examines the average weekday on-time performance percentages for all PSTA routes. The analysis in Table 10 is presented as Minority vs. Non-Minority Route average on-time performance. As shown, average Minority route on time performance is 70% while average non-minority route on time performance is 69%.

More detailed information regarding on-time performance can be found in Appendix D, Table D-4.

Table 10: On-Time Performance Analysis

	On-Time	Late or Early
Minority Routes	70%	30%
Non-Minority Routes	69%	31%
System	70%	30%

Source: PSTA, October 2019 – January 2020 Clever Report

As discussed in Section 2-6, PSTA's disparate impact policy finds a disparate impact when minority service deviates by more than 10 percent from system service and impacts minority populations in a negative fashion. Given that minority routes arrive on average at the same percentage as the systemwide average, no disparate impacts were found in this instance. Despite having no disparate impacts, PSTA will still continue to review the on-time performance of these routes to see if these can be improved.

DISTRIBUTION OF TRANSIT AMENITIES ANALYSIS

Table 11 provides the distribution of PSTA's transit amenities throughout its service area. As shown in Table 11, the minority, low-income, and LEP block groups all contain more than 37 percent of the total benches and shelters. Maps C-1 and C-2, D-1 through D-4 in Appendices C and D, provide additional details on the distribution of amenities by block group within PSTA's service area. In addition, Table D-2 provides additional information on the distribution of amenities by block group. PSTA's distribution of transit amenities was determined to be equitable.

Table 11: Distribution of Amenities in PSTA Service Area

	Shelters	% of Total	Benches	% of Total	Benches and Shelters	% of Total
Minority Block Groups	285	44.9%	351	50.9%	636	48.0%
Non-Minority Block Groups	350	55.1%	338	49.1%	688	52.0%
Low Income Block Groups	322	50.7%	366	53.1%	688	52.0%
Non-Low Income Block Groups	313	49.3%	323	46.9%	636	48.0%
LEP Block Groups	243	38.3%	251	36.4%	494	37.3%
Non-LEP Block Groups	392	61.7%	438	63.6%	830	62.7%
Total	635	100.0%	689	100.0%	1,324	100.0%

Source: PSTA, June – September 2020 Service Period

SERVICE AVAILABILITY ANALYSIS

A good approximation of transit access is the percentage of total population within a quarter-mile of a transit route. Tables 12 through 14 present LEP, minority, and low-income population levels that are within a quarter-mile of PSTA's fixed routes. Populations within the quarter-mile of a transit route were calculated utilizing Remix software that utilizes buffer analysis with ACS data. As all LEP, minority, and low-income populations have greater proximity to transit service than the general population, it was determined that service is equitable.

In addition, the three-quarter mile dimension is used for consistency with the service area definition for complementary paratransit, according to Americans with Disabilities Act (ADA) implementing regulations [49 CFR Part 37.131(a)]. As seen in Table 15, approximately 93 percent of Pinellas County's total population is within a three-quarter miles of PSTA's fixed routes.

Table 12: LEP Population in PSTA Service Area

	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Population within 1/4 Mile of PSTA Service Area	LEP Population within 1/4 Mile of PSTA Service Area as a % of Total Population	LEP Population as % of Total Population within 1/4 Mile of PSTA Service Area
Pinellas County	915,240	46,603	5.09%	31,773	3.5%	5.7%

Source: 2014-2018 American Community Survey Five-Year Estimates

Table 13: Minority Population in PSTA Service Area

	Total Population	Minority Population	Percent Minority	Minority Population within 1/4 Mile of PSTA Service Area	Minority Population within 1/4 Mile of PSTA Service Area as a % of Total Population	Minority Population as % of Total Population within 1/4 Mile of PSTA Service Area
Pinellas County	957,875	246,153	25.7%	169,456	17.7%	30.4%

Source: 2014-2018 American Community Survey Five-Year Estimates

Table 14: Low-Income Population in PSTA Service Area

	Total Population	Low-Income Population	Percent Low Income	Low-Income Population within 1/4 Mile of PSTA Service Area	Low-Income Population within 1/4 Mile of PSTA Service Area as a % of Total Population	% of Low- Income Population within 1/4 Mile of PSTA Service Area
Pinellas County	957,875	126,549	13.2%	87,515	9.1%	15.7%

Source: 2014-2018 American Community Survey Five-Year Estimates

Table 15: Population within Three-Quarter Miles of PSTA Service Area

	Total Population	Total Population within 3/4- Mile of PSTA Service Area	% Total Population within 3/4- Mile of PSTA Service Area
Pinellas County	957,875	850,758	92.5%

Source: 2014-2018 American Community Survey Five-Year Estimates

VEHICLE ASSIGNMENT

Currently, PSTA has 213 total buses in its fleet. All buses are equipped with Automatic Passenger Counters (APC). Table 16 shows the breakdown of PSTA's current bus fleet.

Table 16: PSTA Bus Fleet

Number of Vehicles in Fleet	Fleet Numbers	Year Manufactured	Make	Seated Capacity	Standing Room	W/C Accessible?	A/C & Kneelers?
8	2501-2508	2005	Gillig	38	19	Yes	Yes
7	2510-2517	2005	Gillig	32	16	Yes	Yes
5	2530-2534	2005	Gillig	32	16	Yes	Yes
34	2601-2636	2006	Gillig	38	19	Yes	Yes
12	2650-2661	2006	Gillig	32	16	Yes	Yes
3	720-722	2007	Gillig	32	16	Yes	Yes
11	2701-2711	2007	Gillig	38	19	Yes	Yes
7	2712-2718	2007	Gillig	32	16	Yes	Yes
6	820-825	2008	Gillig	32	16	Yes	Yes
13	2801-2814	2008	Gillig	38	19	Yes	Yes
6	2830-2835	2008	Gillig	32	16	Yes	Yes
3	2901-2903	2009	Gillig	32	16	Yes	Yes
2	2910-2911	2009	Gillig	32	16	Yes	Yes
7	920-926	2009	Gillig	32	16	Yes	Yes
14	10101-10114	2010	Gillig	32	16	Yes	Yes
8	12101-12108	2012	Gillig	38	19	Yes	Yes
8	13101-13108	2013	Gillig	38	19	Yes	Yes
8	14101-14108	2014	Gillig	38	19	Yes	Yes
13	15101-15113	2015	Gillig	38	20	Yes	Yes
7	16101-16107	2016	Gillig	38	20	Yes	Yes
3	17101-17103	2017	Gillig	30	20	Yes	Yes
8	1801-1808	2018	Turtle Top	12	0	Yes	Yes
2	18110-18111	2018	BYD	32	20	Yes	Yes
9	18101-18109	2018	Gillig	30	20	Yes	Yes
9	19101-19109	2019	Gillig	30	20	Yes	Yes

Source: PSTA

MAXIMUM LOAD ANALYSIS

Maximum load is the maximum number of passengers that are on board a bus at a given time. PSTA buses are at maximum capacity when the number of passengers on board exceeds the combined seated and standing capacities. Ideally, PSTA maximum loads should not exceed the seated capacity but this can occur during peak periods on select routes.

Table 17 examines the maximum loads for all PSTA routes. The loads are compared to the smallest seated capacity of PSTA's fleet (30 passengers)⁴. The analysis in Table 11 is presented as Minority vs. Non-Minority Routes maximum loads. As indicated, most routes experienced a maximum load that was below 30 passengers. Two minority routes and two non-minority routes experienced maximum loads above the seated capacity.

Table 17: Maximum Load Analysis⁵

	At or below seated capacity	Above seated capacity	Total	% of Routes At or below seated capacity	% of Routes above seated capacity
Minority Routes	26	2	28	93%	7%
Non-Minority Routes	16	2	18	89%	11%
System	42	4	46	91%	9%

Source: PSTA, Oct 2019 – Feb 2020 Service Period

As discussed in Section 2-6, PSTA's disparate impact policy finds a disparate impact when minority service deviates by more than 10 percent from system service and impacts minority populations in a negative fashion. Given that the percentage of minority routes with a maximum load above seated capacity is within two percent of the systemwide figure, and less than the non-minority routes, no disparate impacts were found.

⁴ The Turtletop vehicles shown in Table 16 have a capacity of less than 30 passengers, but those vehicles are only used on select routes with small passenger loads.

⁵ There are two more routes counted here than in the system count (Table 9) because two routes (the Suncoast Beach Trolley and Central Avenue Trolley) are each split into two routes for internal scheduling purposes.

2-6 MAJOR SERVICE POLICY

Requirement: Submit a description of the public engagement process for setting the “major service change policy” and disparate impact policy, with verification of Board approval of those policies.

Major Service Policy

PSTA conducts a Title VI analysis on all Major Service Changes. PSTA defines a Major Service Change as any modification that affects 25 percent or more decrease of any individual route’s revenue hours and/or miles. When any change exceeds the established threshold, PSTA proceeds with posting the appropriate public notices and conducting public hearings in compliance with the Public Participation Plan detailed previously in this Title VI Program Update. Equity analyses were also conducted for service changes that affected 25% or more of the transit route miles, transit vehicle miles or estimated ridership even if the changes did not result in a decrease in service.

The adverse effect is measured by the change between the existing and proposed service levels that would be deemed significant. Additions to service may also result in disparate impacts, if the addition is at the expense of reductions to other routes.

Disparate Impact Policy

Disparate impacts are examined both when a Major Service Change is undertaken and/or a fare change is implemented. PSTA defines a disparate impact as any time there is a difference in impacts between minority and total populations of plus or minus ten percent that negatively impacts the minority population. For example, if the minority population makes up 30 percent of the overall population, but would bear 45 percent of the adverse impacts, there may be a disparate impact since the minority group bears 15 percent more than its expected share. The Disparate Impact Policy is applied uniformly to all modes of service operated by PSTA.

Disproportionate Burden Policy

The Disproportionate Burden Policy applies to adverse effects on low-income populations as a result of Major Service Changes and all fare changes. PSTA defines a disproportionate burden as any time there is a difference in impacts between low-income and total populations of plus or minus ten percent that negatively impacts the low-income population. For example, if the low-income population makes up 30 percent of the overall population, but would bear 45 percent of the impacts, there may be a disproportionate impact since the low-income group bears 15 percent more than its expected share. The Disproportionate Burden Policy is applied uniformly to all modes of service operated by PSTA.

Pursuant to Title VI requirements, PSTA advertises for public comment on these three policies that are presented on and open for public comment at PSTA committee and board meetings. Notices are placed on all buses in the Fleet, at all terminals, and highlighted on the PSTA website. These documents remain on the website with a link for people to review and send comments ongoing.

2-7 EQUITY ANALYSIS

Requirement: Submit the results of any equity analysis for any major service changes and/or fare changes implemented since the last Title VI Program submission, with verification of Board approval of the equity analysis for any service or fare changes.

In accordance with its Title VI policy, PSTA conducts equity analyses for all Major Service Changes and fare changes. During the three-year reporting period, five Major Service Changes were implemented. These changes occurred in February 2018, June 2018, and October 2018, October 2019 & March 2020. A detailed equity analysis for these service changes is provided in Appendix H. In addition, PSTA's Fare Policy that was adopted by the PSTA Board of Directors in July of 2014 is provided in Appendix H as well. Equity analyses were also conducted for service changes that affected 25% or more of the transit route miles, transit vehicle miles or estimated ridership even if the changes did not result in a decrease in service.

Methodology

PSTA utilizes the transit planning software Remix to conduct Title VI analyses. Remix includes an analytic tool specifically designed for Title VI. The tool compares geographic and demographic coverage of a transit network between two booking periods. Below is the description Remix provides regarding their data sources and methodology:

1. Get the population near a route, including its low income and minority percentage.
 - For each route, build a shape that represents the area within quarter mile of any of its stops.
 - Intersect the catchment area with the 2013-2017 ACS Census data. Get a list of block groups and the percentage overlap with each.
 - For each block group, take the percentage of overlap and multiply it by the block group's statistics.
 - Get the population, minority population, and low-income population for each group and sum them together. This is the total population a route could serve.
2. Compare the number of people-trips, before and after.
 - Multiply the population near a route times the number of trips it makes (per year) to get "people-trips".
 - Repeat for low-income and minority populations to get "low income people-trips" and "minority people trips".
 - Compare these numbers between the before and after versions of the route, to get a set of people-trip differences. We match before and after using routes that have the same name.
3. Get the total difference in people-trips across the transit system.
 - Repeat the process above for every route in the transit system.

- Sum together the difference in people trips. This will return three numbers: total difference in people-trips, total difference in low-income people-trips, and total difference in minority people trips.
4. Calculate the change borne by low-income and minority populations.
- Divide the total difference in low-income people trips by the total difference in people-trips to get the percentage of change borne by those with low incomes.
 - Repeat for minority people-trips.
5. Compare the percentage change to the average in the service area.
- Calculate the average percentage of low-income and minority populations across the entire service area.
 - Subtract from the change borne by those populations.
 - Get two final numbers: the delta between the impact this set of transit changes had on low income and minority populations compared to any average change.

The following is a list of data sources Remix utilizes to compute its figures:

- Census data is provided by the US American Community Survey, 2013-2017.
- Population is coded by table B03002, field B03002001.
- Low income status is set at 100% of the US poverty level. This is coded by the appropriate fields in table C17002.
- Minority status is coded by table B03002, by subtracting the white, non-Hispanic population (B03002003) from the total population (B03002001).
- Service area is a set of block groups determined by the shapefile PSTA provided to Remix.
- Map and routing data is provided OpenStreetMap, Mapbox, and Valhalla.

See Appendix H for a table that shows the calculation methodology as described above.

February 2018 Service Change Equity Analysis⁶

In the February 2018 service change, four routes that exceeded the service change threshold experienced schedule adjustments or were removed from service. As shown in Table 1 in Appendix H, no routes exceeded the ten percent margin for disparate impact or disproportionate income. The changes borne by low income and minority residents were within ten percent of the county averages. Figure 1A in Appendix A displays a map of the Feb 2018 service change.

June 2018 Service Change Equity Analysis

In the June 2018 service change, one route exceeded the service change threshold. Route 100X was extended from Gateway Mall to Downtown St. Petersburg to provide a one seat ride from this neighborhood to Downtown Tampa. The extended service operates on a similar schedule to the

⁶ Equity analyses conducted up to the Oct 2019 service change were done before PSTA received FTA reviewer comments shown in Appendix I.

previous service. As shown in Table 2 in Appendix H, the expansion of this routes neither created a disproportionate burden or disparate impact within the ten percent margin. The changes borne by low income and minority residents were within ten percent of the county averages.

October 2018 Service Change Equity Analysis

In the October 2018 service change, two routes exceeded the service change threshold. Routes 97 and 98 were removed from service and replaced with a single limited stop service: Route 52 LX. This service operates a similar span of service to the peak hour routes that it replaced. As shown in Table 3 in Appendix H, the removal of Routes 97 and 98 and adjustments to Route 52 neither created a disproportionate burden or disparate impact within the ten percent margin.

October 2019 Service Change Equity Analysis

In the February 2018 service change, two routes exceeded the service change threshold due to scheduling and routing adjustments. As shown in Table 4 in Appendix A, no routes exceeded the ten percent margin for disproportionate burden. Changes to the route 5 did slightly exceed the disparate impact threshold. However, there were no net reductions in service along Route 5. Figure 4 displays the October 2019 service change.

As shown in Figure 4 in Appendix H, Route 5 now ends at Grand Central Station. The eastern segment of Route 5 is now served by the Route 9. Headways were lowered from 30 minutes peak/60 minutes off peak during the weekdays to 30 minutes all day. As a result of this service change, this segment of the route received a net increase in service, which will provide low-income riders additional trip options throughout the day.

January 2020 Fare Change Equity Analysis

In preparation for the implementation of a new smart card system, Flamingo Fares, PSTA conducted a fare equity analysis of changes to the fare structure that would be implemented with the launch of this new fare media. No fare increases were proposed. PSTA proposed to reduce the number of fare categories and implement fare capping. In its initial analysis, PSTA found that the new fare structure would not create a disparate impact or disproportionate burden. See Appendix H for additional information. See Appendix G for documentation of board approval of this fare equity analysis.

PSTA did not launch Flamingo Fares in 2020. PSTA will take an updated fare equity analysis to its Board of Directors prior to an anticipated launch in 2021.

March 2020 Service Change Equity Analysis (COVID-19 service change)⁷

In the temporary service change that will begin on March 29, 2020 that was developed in response to the COVID-19 outbreak, the majority of the PSTA system (33 routes) experienced schedule adjustments that exceed the 25% major service change threshold.

Table 5 in Appendix H shows the collective impact of the major service change on low-income and minority residents, which is not within ten percent of the low-income or minority population of Pinellas County. Therefore, the major service changes collectively do not create a disproportionate burden or disparate impact.

Additional service changes have been made during the COVID-19 pandemic since March 2020. PSTA did not conduct service equity analyses for those changes since they were emergency actions to respond to the pandemic.

⁷ As shown in Appendix H this service change utilized a different methodology from previous analyses.

APPENDIX A: Title VI Service Standards, Policies, and Assurances

TITLE VI PROGRAM POLICIES**Section 1: Title VI Program Objectives**

Pinellas Suncoast Transit Authority's Title VI Program goals, objectives, and service policies are:

GOAL

To provide safe, convenient, economical public transportation service, and amenities which are distributed without regard to race, color, income status, or national origin.

OBJECTIVE 1

To achieve an increase in system usage and customer satisfaction by constantly improving safety, courtesy, comfort, and reliability to all passengers without regard to income or racial characteristics.

OBJECTIVE 2

To achieve and sustain industry-wide recognition as a first-class transit system in the overall provision of transportation services to its customers without regard to income or racial characteristics.

OBJECTIVE 3

To develop and maintain short and long-term plans which reflect customer and service needs.

OBJECTIVE 4

To utilize Disadvantaged Business Enterprise Businesses to the maximum extent possible in PSTA contracts.

RESPONSIBILITY**PLANNING DEPARTMENT**

The responsibility of the Title VI monitoring is delegated to the Planning Department, working in cooperation with the Transportation and Maintenance Departments. Title VI monitoring will include the development of system-wide service policies, standards and procedures relative to transit service considerations in conformance with Federal Transit Administration Circular 4702.1B.

Chief Executive Officer

Date

Section 2: Vehicle Headway, Service Availability, and On-Time Performance Policies and Procedures**PURPOSE**

To provide policies and procedures on implementing service frequency (i.e., headway) improvements and modifications.

POLICIES

1. PSTA will establish transit routes that adhere to a fixed schedule for improved customer service.
2. Routes and schedules will be monitored to improve system connectivity and timed transfers.
3. PSTA will adopt a system-wide goal for on-time performance each fiscal year.

PROCEDURES

1. Each month the Transportation Department will follow up and evaluate customer complaints, and any ridecheck reports which pertain to on-time performance.
2. The Transportation Department will evaluate on-time performance. In this way, staff can determine the cause for delays and recommend changes in scheduling or routing when necessary.
3. The Planning Department and the Transportation Department will evaluate on-time performance system wide. This evaluation will be used to develop a system-wide goal for improved, on-time performance each fiscal year.
4. The Planning and Transportation Departments will evaluate routes according to passenger productivity to determine the need for improved service frequency.

Chief Executive Officer

Date

Section 3: Vehicle Load/Assignment Policies and Procedures**PURPOSE**

To provide policies and procedures on assignment of buses to routes and how excess vehicle loads should be handled.

POLICIES

1. The largest vehicles will be assigned to those routes that carry the highest number of passengers per revenue hour.
2. A plug bus will be sent when the peak loads cannot be accommodated due to excess passenger demand.
3. Stating capacity is taken into account when new buses are assigned to routes.

PROCEDURES

1. The Maintenance Department will maintain a bus inventory which includes vehicle length, seating capacity, ancillary bus equipment, purchase date, and useful life of the vehicle.
2. The Planning and Transportation Departments will evaluate the maximum passenger loads for selected high-volume routes to ensure that the vehicle(s) assigned to these routes can accommodate peak passenger loads.
3. When a new bus has a smaller capacity than the bus it is to replace, passenger loads will be evaluated to ensure the new bus will accommodate the market demand.
4. The Planning Departments will monitor bus assignments and the distribution of equipment within the PSTA service area.

Chief Executive Officer

Date

Section 4: Transit Safety, Security, and Access Policies and Procedures**PURPOSE**

To provide policies and procedures to assure transit passengers have safe and reliable public transit service.

POLICIES

1. PSTA adopted a System Safety Program Plan (SSPP) which conforms with Rule Chapter 14-90 Florida Administrative Code. The SSPP is periodically updated when necessary.
2. PSTA will establish system-wide performance objectives for each fiscal year relative to accident rates and road failures and monitor achievements of these objectives.
3. PSTA adopted a Continuation of Operations Plan to provide a plan for handle disruptions of service that are more than minor incidents.
4. PSTA will utilize the Threat and Vulnerability Assessment (TVA) to identify potential security needs and program improvements.

PROCEDURES

1. Adopt an SSPP and submit annual Safety Certifications to the Florida Department of Transportation.
2. The Transportation and Maintenance Departments will investigate accidents and road failures to determine the cause and implement corrective actions when necessary.
3. The Maintenance Department will evaluate the relocation of existing bus stops or suitable locations for new bus stops whenever the Planning or Transportation Departments considers the placement of a bus stop to pose an operational hazard.
4. The Transportation and Maintenance Departments will recommend proactive changes to reduce the incidence of future accidents and road failures to the Chief Executive Officer.
5. Reserve one percent of FTA Section 5301 funding for transit security improvements and program this funding in the Program of Projects (POP) for each year.
6. PSTA will continue to have a multi-disciplined threat awareness safety team tasked to identify key safety/security issues and address them.

Chief Executive Officer

Date

Section 5: Transit Service Policies and Procedures

PURPOSE

To provide policies and procedures to ensure convenient access to public transit.

POLICIES

1. PSTA will maximize the general coverage of transit service in the PSTA service area, while following a market-driven implementation strategy. PSTA will continue to emphasize service enhancements for major urban roadway corridors serving major transit generations and attractors.
2. PSTA will support and promote land use designs which shorten the walking distance to bus stops.

PROCEDURES

1. Routes that are not meeting performance standards will be evaluated to determine the productivity of route segments that are duplicative. Any proposed realignment will then be evaluated based upon the number of transit generators and attractors within a quarter-mile of transit service.
2. Routes that are not meeting performance standards will be evaluated to determine segments where ridership exists and recommend those segments be combined with existing routes, if possible.
3. The Planning Department will evaluate routes that are recommended for elimination to determine the impact on minority users. Feeder service will be considered to provide continued service, if replacement fixed-route service is not implemented.
4. The Planning Department will request that city, county, and state governmental entities include PSTA in the development review process for pedestrian accessibility to transit stops. PSTA staff will recommend developments that are mixed use and include multiple points of direct and convenient pedestrian access to transit stops.
5. Land development designs that are conducive to pedestrian activity or transit service will be supported by the Planning Department and promoted for new developments and redevelopments.
6. The Maintenance Department will attend pre-construction meetings so that contractors are aware of accessibility needs with respect to sidewalk and roadway construction.
7. PSTA will continue to work cooperatively with state and local jurisdictions on passenger loading pads, pedestrian bridges (for swale crossings), and accessible connections from sidewalks to bus stops, whenever a roadway is constructed, re-constructed or re-surfaced. All accessibility improvements will conform to Americans with Disabilities Act (ADA) requirements.
8. PSTA will provide paratransit feeder service for those persons with disabilities who cannot access bus stops due to their disabilities and architectural barriers. This will allow persons with

- disabilities to access and utilize the regular bus system. PSTA will provide free transfers to PSTA fixed routes in these circumstances.
9. PSTA will continue to conduct periodic market research to determine the distance most users must travel to gain access to transit service. Market research should be undertaken at minimum every five years.

Chief Executive Officer

Date

Section 6: Transit Shelters, Benches, and Bicycle Racks Policies and Procedures

PURPOSE

To provide policies and procedures relative to the provision of transit amenities.

POLICIES

1. Passenger shelters will be installed at high usage bus stops throughout the PSTA service area.
2. Passenger benches will be installed to provide seating at PSTA bus stops.
3. Bicycle racks will be installed at major transfer points and other bus stops when installation can be justified according to market demand.
4. All buses and trolley vehicles will be equipped with bike racks.
5. All passenger amenity installations will be constructed in accordance with Americans with Disabilities Act (ADA) implementation regulations.

PROCEDURES

Passenger Shelters

1. The Planning and Facility Maintenance Departments will work together to identify potential shelter locations through ridership data, passenger requests, and recommendations from bus drivers.
2. Public/private facilities such as libraries, hospitals, municipal buildings, shopping centers, educational, residential and employment centers will be identified as potential shelter locations and evaluated according to ridership data.
3. The Planning and Facilities and Equipment Services Department will investigate shelter locations when requests are received from passengers.
4. The Planning Department will include the location of shelters and their distribution within the PSTA service area in each Transit Development Plan (TDP) Update.
5. The Facility Maintenance Department will schedule cleaning of the shelters at regular intervals. Staff will periodically inspect the shelters and report any damage to the Superintendent of Facility Maintenance to enable timely repair.
6. The Planning Department will plan for scheduled replacement of shelters and shelter parts and include funding in FTA Section 5307 grants.

Passenger Benches

1. The Facilities and Equipment Department will place benches at locations that are requested by staff and/or passengers.
2. The Facilities and Equipment Services Department will request construction of bench pads to be part of roadway and sidewalk projects whenever feasible.

3. An inventory of benches will be maintained (by route) along with accessibility features. The Planning Department will monitor bench placements and the distribution of benches within the PSTA service area for Title VI considerations.
4. The Facilities and Equipment Services Department will schedule periodic bench maintenance and repair or replace benches when necessary.
5. The Planning Department will include the purchase of benches in FTA Section 5307 grants.

Bicycle Racks

1. The Facilities and Equipment Services Department will identify locations where bicycle racks should be installed and schedule installation.
2. The Facilities and Equipment Services Department will monitor the bicycle rack inventory and will notify the Planning Department when additional racks are needed.
3. The Facilities and Equipment Services Department will maintain an inventory of bike racks in the PSTA service area.
4. The Planning Department will include bike racks in FTA Section 5307 grant applications.
5. All buses and trolley vehicles will be equipped with bike racks.

Chief Executive Officer

Date

Section 7: Limited English Proficiency Program (LEPP) Policies and Procedures

PURPOSE

To provide policies and procedures relative to the implementation of the LEPP.

POLICIES

1. PSTA has targeted Spanish speakers as the predominant LEP population for PSTA assistance.
2. PSTA will develop a program that ensures that LEP persons are considered for effective participation in PSTA's programs, activities, and services.
3. PSTA will develop appropriate strategies for serving LEP individuals who come into contact with PSTA staff and services.
4. PSTA will monitor and update the LEPP to ensure effective services and communication for LEP persons.

PROCEDURES

1. PSTA will inventory and conduct outreach with the LEP community organizations to better understand their concerns and to effectively serve their clients.
2. PSTA will create bilingual text for future on-board surveys, utilize bilingual customer service representatives and staff to serve LEP clients, and provide Google translation capabilities on its website.
3. PSTA will continue to training incoming staff to ensure that those who regularly interact with passengers and the public understand how to interact with callers or those that requires in-person LEP assistance.
4. PSTA will undertake outreach that continues to meet the ongoing needs of our LEP customers. This includes but is not limited to: advertising new LEP services, providing Title VI forms and notices in Spanish and additional languages by request, and maintaining an open line of communication with community organizations throughout the service area.
5. Include with new bus operator and bus operator refresher training a section or module on assisting LEP customers.
6. Utilize community organizations and public meetings to obtain feedback on LEP assistance provided by PSTA. Utilize this feedback to improve assistance activities and services.
7. Continue to conduct internal monitoring of customer service assistance provided to LEP customers and make modifications when necessary.
8. Post signs at intake and entry points so that LEP persons know how to access language services at initial points of contact.

9. Include public notices in Spanish; post these notices on-board PSTA buses and at targeted community organizations.
10. Update automated telephone voice mail attendant and menu systems for Spanish speaking customers.

Chief Executive Officer

Date

DEPARTMENT OF TRANSPORTATION TITLE VI ASSURANCE

The Pinellas Suncoast Transit Authority (hereinafter referred to as the “Recipient”) HEREBY AGREES THAT as a condition to receiving any Federal assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1965, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2004d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, or natural origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the recipient receives federal assistance from the Department of Transportation, including Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to the Title VI Program.

1. That the Recipient agrees that each “program” and each “facility” as defined in subsection 21.12(e) and 21.23 (b) of the Regulations, will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operational in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all Title VI Programs and, in adapted form in all proposals for negotiated agreements:

The Pinellas Suncoast Transit Authority, in accordance with the Title Vi of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to this Act and the Regulations.

4. That the Recipient shall insert the clauses of Appendix B of the assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties (a) for the subsequent transfer of real property acquired or improved under Title VI Program; and (b) for the construction or use of or access to space on, over, or under real property acquired or improved under Title VI Program.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Title VI Program and is binding on it, other recipients, sub grantees, contractors, transferees, successors in interest and other participants in the Title VI Program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

DATED: _____

Brad Miller, Chief Executive Officer
Pinellas Suncoast Transit Authority
(Signature of Authorized Official)

FEDERAL TRANSPORTATION ADMINISTRATION CIVIL RIGHTS ASSURANCE

The Pinellas Suncoast Transit Authority, HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Civil Rights Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The Pinellas Suncoast Transit Authority will compile, maintain and submit in timely manner Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation's Title VI regulation, Multilingual Part 21.9.
3. The Pinellas Suncoast Transit Authority will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transportation Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

(Brad Miller, Chief Executive Officer)
(Signature of Authorized Officer)

Date



Pinellas Suncoast Transit Authority

TITLE VI PROCEDURES FOR TRACKING AND INVESTIGATING COMPLAINTS

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits. All complaints made to PSTA can also be made to the FTA, and the like, or seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind prohibited by law.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

GENERAL

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the PSTA Title VI Program, 3201 Scherer Drive, St. Petersburg, Florida, 33716. Complainants have the right to obtain the complaint directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Program Officer Program Officer may be utilized for resolutions. The Title VI Program Officer will notify the PSTA Chief Executive Officer of all Title VI related complaints as well as all resolutions.

PROCEDURE

- 1) The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Program Officer will interview the complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination date when the complainants became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and State law may require complaints to be filed within a certain period of time of the alleged incident

- 2) Upon receipt of the complaint, the Title VI Program Officer will determine its jurisdiction, acceptability, and need for additional information.
- 3) The complainant will be provided with a written acknowledgement that PSTA has either accepted or rejected the complaint.
- 4) A complaint must meet the following criteria for acceptance
 - a. The complaint must be filed within 180 days of the alleged occurrence;
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve a PSTA service of a Federal-aid recipient, sub-recipient or contractor.
- 5) A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
- 6) Once PSTA decides to accept the complaint for investigation, the complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying; complainant's name, basis, alleged harm, race, color, and national origin of the complainant.
- 7) In cases where PSTA's Human Resources Department decides to accept the complaint for investigation of the complaint, within 90 calendar days of the acceptance of the complaint, PSTA's Title VI Program Officer will prepare an investigative report for review by the Chief Executive Officer. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
- 8) The investigative report and its findings will be reviewed by the Human Resources Director, and in some cases the investigative report will be reviewed by PSTA's legal counsel.
- 9) The Human Resources Director, Chief Executive Officer, and the legal counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows;
 - a. In the event PSTA is in noncompliance with Title VI regulations, remedial actions will be listed.
- 10) Notice of Director's determination will be mailed to the complainant. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. Notice of appeals are as follows;
 - a. PSTA will reconsider this determination, if new facts, come to light.

- b. If complainant is dissatisfied with the determination and/or resolution set forth by PSTA, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 230 Peachtree Street, NW Atlanta, GA 30303
- 11) A copy of the complaint and PSTA's investigative report of finding and final remedial action plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.
- 12) A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

TITLE VI ENVIRONMENTAL JUSTICE ACTIONS FOR NEPA PROJECTS

In order to integrate into community outreach activities, considerations expressed in the PSTA Environmental Justice Program will be addressed at the scoping stage in the NEPA process, which provides early identification of public and agency issues. Minority and low-income populations will be identified as early as possible and their concerns will be examined and addressed as required by NEPA and 23 U.S.C. 109(h), impacts on all communities including low-income communities must be routinely identified and addressed.

PSTA is committed to addressing these Environmental Justice principles:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

At the start of the planning process, PSTA will determine whether Environmental Justice issues exist and use data and other information to: (1) determine benefits to and potential negative impacts on minority populations and low-income populations from proposed investments or actions; (2) quantify expected effects (total, positive and negative) and disproportionately high and adverse effects on minority populations and low-income populations; and (3) determine the appropriate course of action, whether avoidance, minimization, or mitigation.

PSTA will support Title VI and environmental justice principles to:

- Ensure that new investments and changes in transit facilities, services, maintenance, and vehicle replacement deliver equitable levels of service and benefits to minority and low-income populations.
- Avoid, minimize or mitigate disproportionately high and adverse effects on minority and low-income populations. Enhance public involvement activities to identify and address the needs of minority and low-income populations in making transportation decisions.

APPENDIX B: Detailed Support Information

Table B-1: PSTA Minority Route Details⁸

ROUTE	TOTAL MILES	MINORITY CENSUS BLOCK GROUP MILES	PERCENT MINORITY	MINORITY ROUTE
4	34.49	21.50	62.32%	YES
5	15.24	4.24	27.84%	NO
7	16.71	10.08	60.34%	YES
9	22.73	10.03	44.13%	YES
11	36.53	25.08	68.66%	YES
14	17.82	13.72	77.02%	YES
15	17.26	13.95	80.84%	YES
16	13.47	7.27	53.99%	YES
18	50.16	22.08	44.01%	YES
19	38.95	10.81	27.76%	NO
20	26.63	20.81	78.16%	YES
22	12.91	6.56	50.85%	YES
23	23.85	15.42	64.66%	YES
32	4.75	4.75	100.00%	YES
34	33.33	21.87	65.62%	YES
35/355 (CAT)	20.72	8.9	42.90%	YES
38	22.18	7.70	34.71%	YES
52	44.10	22.88	51.88%	YES
58	32.02	8.79	27.46%	NO
59	23.91	6.07	25.38%	NO
60	11.55	5.60	48.47%	YES
61	35.68	15.35	43.02%	YES
62	40.23	10.95	27.21%	NO
65	25.01	3.65	14.59%	NO
66L	30.66	9.49	30.94%	NO
67	27.16	8.30	30.56%	NO
68	15.60	0.71	4.57%	NO
73	31.48	9.70	30.81%	NO
74	25.50	15.20	59.60%	YES
75	23.05	10.76	46.66%	YES
76	20.52	6.67	32.49%	NO
78	15.82	7.10	44.89%	YES
79	45.38	24.78	54.60%	YES
90	34.17	15.49	45.34%	YES
100X	36.58	18.12	49.54%	YES
300X	22.81	8.44	37.00%	YES
521 (52LX)	43.10	18.29	42.43%	YES
777/888 (SBT)	39.32	0	0%	NO
701 (JT NB & SB)	14.80	0.61	4.12%	NO
703 (JTC)	26.45	2.63	9.94%	NO
711 (Looper)	4.36	1.46	33.63%	YES
812	39.23	0.61	1.55%	NO
813	17.55	6.42	36.58%	YES
814	20.05	1.36	6.81%	NO

⁸ Source: PSTA Route Shapefile Oct 2019 & 2014-2018 5-Year ACS

Table B-2: PSTA Route Service Profile⁹

<i>Route</i>	<i>Route Type</i>	<i>Minority Route</i>	<i>Weekday Peak</i>	<i>Weekday</i>	<i>Saturday</i>	<i>Sunday</i>	<i>Weekday Start</i>	<i>Weekday End</i>	<i>Saturday Start</i>	<i>Saturday End</i>	<i>Sunday Start</i>	<i>Sunday End</i>
4	Fixed	Yes	15	15	30	60	5:30 AM	11:30 PM	5:30 AM	10:45 PM	8:15 AM	6:45 PM
5	Fixed	No	30	60	60	60	6:00 AM	8:30 PM	6:30 AM	8:25 PM	8:00 AM	7:00 PM
7	Fixed	Yes	60	60	60	60	5:45 AM	9:45 PM	5:45 AM	8:00 PM	5:45 AM	8:00 PM
9	Fixed	Yes	30	30	60	60	5:15 AM	10:00 PM	5:45AM	10:00AM	5:45AM	7:15PM
11	Fixed	Yes	60	60	60	120	6:00 AM	7:25 PM	6:00 AM	6:10 PM	7:50 AM	6:05 PM
14	Fixed	Yes	30	30	30	60	5:40 AM	8:50 PM	5:40 AM	8:50 PM	6:45 AM	7:05 PM
15	Fixed	Yes	60	60	60	60	5:25 AM	8:10 PM	5:48 AM	7:50 PM	5:48 AM	7:50 PM
16	Fixed	Yes	60	60	60	60	6:15AM	7:45PM	6:15AM	7:15PM	8:15AM	7:00PM
18	Fixed	Yes	20	30	30	60	5:10 AM	11:30 PM	5:15 AM	10:30 PM	6:10 AM	7:50 PM
19	Fixed	No	30	45	45	60	5:15 AM	11:25 PM	5:10 AM	10:20 PM	6:20 AM	7:05 PM
20	Fixed	Yes	60	60	60	60	5:25 AM	7:10 PM	5:25 AM	7:10 PM	7:20 AM	6:10 PM
22	Fixed	Yes	60	60	60	Not in Service	7:15AM	9:30PM	7:15AM	9:30PM	Not in Service	Not in Service
23	Fixed	Yes	30	30	30	60	5:20 AM	8:30 PM	5:20 AM	8:30 PM	8:20 AM	5:30 PM
32	Circulator	Yes	35	35	35	Not In Service	8:55 AM	5:00 PM	8:55 AM	5:00 PM	Not In Service	Not In Service
34	Fixed	Yes	20	30	30	60	5:15AM	11:30PM	5:15AM	10:30PM	6:15AM	10:15PM
38	Fixed	Yes	60	60	60	60	5:35 AM	9:45 PM	6:00 AM	8:45 PM	7:35 AM	6:20 PM
52	Fixed	Yes	30	30	30	50	4:55 AM	12:10 AM	4:50 AM	10:25 PM	7:09 AM	7:34 PM
58	Fixed	No	60	60	Not In Service	Not In Service	5:35 AM	7:00 PM	Not In Service	Not In Service	Not In Service	Not In Service
59	Fixed	No	15	15	30	60	5:10 AM	9:38 PM	5:45 AM	10:00 PM	5:35 AM	9:10 PM
60	Fixed	Yes	20	20	30	30	5:10 AM	11:20 PM	5:00 AM	9:30 PM	7:25 AM	9:20 PM
61	Fixed	Yes	60	60	60	60	5:25 AM	8:15 PM	5:25 AM	8:15 PM	7:20 AM	6:35 PM
62	Fixed	No	60	60	60/120	Not In Service	5:05 AM	8:30 PM	6:40 AM	7:30 PM	Not In Service	Not In Service
65	Fixed	No	60	60	60	60	6:00AM	7:00PM	6:00AM	7:00PM	8:30AM	5:15PM
66L	Fixed	No	60	Not In Service	Not In Service	Not In Service	5:10 AM	7:50 PM	Not In Service	Not In Service	Not In Service	Not In Service
67	Fixed	No	60	60	60	Not In Service	6:00 AM	6:55 PM	6:00 AM	6:45 PM	Not In Service	Not In Service
68	Fixed	No	60	60	60	60	6:10 AM	9:40 PM	5:55 AM	10:45 PM	6:45 AM	9:50 PM
73	Fixed	No	60	60	60	Not In Service	5:50 AM	6:55 PM	5:45 AM	6:55 PM	Not In Service	Not In Service

⁹ Service profile information is from before COVID-19 service reductions in March 2020.

74	Fixed	Yes	20	20	60	60	5:15 AM	8:47 PM	7:00 AM	7:50 PM	8:15 AM	6:45 PM
75	Fixed	Yes	60	60	60	60	5:15 AM	8:20 PM	7:00 AM	8:10 PM	7:00 AM	7:45 PM
76	Fixed	No	60	60	60	Not In Service	5:55 AM	6:50 PM	7:00 AM	6:45 PM	Not In Service	Not In Service
78	Fixed	Yes	30	45	30	35	5:30 AM	7:50 PM	6:25 AM	7:50 PM	7:50 AM	5:10 PM
79	Fixed	Yes	30	35	60	60	5:30 AM	8:25 PM	5:35 AM	8:14 PM	7:55 AM	7:08 PM
90	Fixed	Yes	2 trips AM/PM	Not in Service	2 trips AM/PM	2 trips AM/PM	7:05 AM	5:10 PM	4:20 AM	5:30 PM	4:20 AM	5:30 PM
100X	Express	Yes	45	2 trips	Not In Service	Not In Service	4:40 AM	8:47 PM	Not In Service	Not In Service	Not In Service	Not In Service
300X	Express	Yes	45	2 trips	Not In Service	Not In Service	6:15 AM	7:55 PM	Not In Service	Not In Service	Not In Service	Not In Service
521 (52LX)	Fixed (Limited)	Yes	30	Not in Service	Not in Service	Not in Service	5:22AM	6:22PM	Not in Service	Not in Service	Not in Service	Not in Service
701 (JTNB)¹⁰	Trolley	No	30	30	30	30	9:42AM	10:08PM	9:42AM	11:38PM	9:42AM	10:08PM
702 (JTSB)	Trolley	No	30	30	30	30	9:45AM	10:18PM	9:45 AM	11:48PM	9:45AM	10:18PM
703 (JTC)	Trolley	No	60	60	60	60	9:00AM	11:00PM	9:00AM	1:00AM	9:00AM	11:00PM
711 (Looper)	Circulator	Yes	15	15	15	15	7:00AM	10:00PM	8:00AM	10:00PM	8:00AM	10:00PM
Central Avenue Trolley (35/355)¹¹	Trolley	Yes	20	20	30	30	6:30 AM	11:25 PM	6:30 AM	12:00 AM	6:10 AM	11:40 PM
Suncoast Beach Trolley (777/888)	Trolley	No	30	30	30	30	4:45 AM	11:30 PM	5:00 AM	1:00 PM	5:00 AM	11:30 PM
812	Fixed	No	60	60	60	Not In Service	7:35 AM	6:25 PM	9:00 AM	7:20 PM	Not In Service	Not In Service
813	Fixed	Yes	60	60	60	Not In Service	7:05 AM	7:10 PM	8:30 AM	5:30 PM	Not In Service	Not In Service
814	Fixed	No	60	60	60	Not In Service	6:45AM	5:45PM	8:30AM	5:30PM	Not In Service	Not In Service

¹⁰ All Jolley Trolley routes (those that start with "JT" operate on the Saturday schedule on Fridays.

¹¹ The Central Avenue Trolley & Suncoast Beach Trolley operate longer on Fridays.

Table B-3: PSTA Route On-Time Performance¹²

Route Name	Minority Route	Avg. Weekday Early	Avg. Weekday On-time	Avg. Weekday Late
4 - ROUTE 4	YES	6%	80%	15%
5 - ROUTE 5	YES	4%	83%	13%
7 - ROUTE 7	YES	1%	89%	10%
9 – ROUTE 9	YES	12%	63%	25%
11 - ROUTE 11	YES	4%	55%	41%
14 - ROUTE 14	YES	5%	82%	14%
15 - ROUTE 15	YES	5%	68%	27%
16 – ROUTE 16	YES	5%	85%	10%
18 - ROUTE 18	YES	3%	55%	43%
19 - ROUTE 19	YES	6%	78%	16%
20 - ROUTE 20	YES	5%	78%	17%
22 – ROUTE 22	YES	4%	78%	18%
23 - ROUTE 23	YES	9%	82%	9%
32 - ROUTE 32	YES	4%	77%	19%
34 – ROUTE 34	YES	5%	76%	20%
35 - CENTRAL AVENUE TROLLEY	YES	4%	78%	18%
38 - ROUTE 38	YES	8%	70%	22%
52 - ROUTE 52	YES	3%	56%	42%
58 - ROUTE 58	YES	15%	66%	20%
59 - ROUTE 59	YES	11%	63%	26%
60 - ROUTE 60	YES	3%	88%	9%
61 - ROUTE 61	YES	5%	61%	34%
62 - ROUTE 62	NO	6%	66%	28%
65 - ROUTE 65	NO	2%	76%	22%
66 - ROUTE 66L	NO	3%	67%	30%
67 - ROUTE 67	YES	7%	76%	16%
68 - ROUTE 68	NO	1%	80%	19%
73 - ROUTE 73	NO	3%	64%	33%

¹² PSTA Clever Reports – Oct 2019 – Feb 2020 (Jolley Trolley routes not included)

Route Name	Minority Route	Avg. Weekday Early	Avg. Weekday On-time	Avg. Weekday Late
74 - ROUTE 74	NO	3%	86%	12%
75 - ROUTE 75	YES	5%	74%	21%
76 - ROUTE 76	YES	15%	78%	7%
78 - ROUTE 78	YES	2%	82%	17%
79 - ROUTE 79	YES	7%	78%	16%
90 - ROUTE 90	YES	9%	62%	29%
355 - CENTRAL AVENUE TROLLEY	YES	25%	61%	15%
521 – ROUTE 52LX	YES	2%	63%	35%
711 - LOOPER	YES	29%	48%	23%
777 - SUNCOAST BEACH TROLLEY	NO	12%	53%	35%
812 - OLDSMAR / TAMPA CONNECTOR	NO	16%	61%	23%
813 - COUNTRYSIDE / DUNEDIN PALM HARBOR	NO	21%	59%	20%
814 – SAFETY HARBOR CONNECTOR	NO	20%	63%	17%
888 - SUNCOAST BEACH TROLLEY	NO	6%	72%	22%
100 - ROUTE 100X	NO	8%	72%	20%
101 – ROUTE 100X	NO	9%	74%	18%
300X - ROUTE 300X	YES	3%	57%	41%
WEEKDAY SYSTEM AVERAGE		7%	70%	24%

Table B-4: PSTA Maximum Route Loads¹³

ROUTE	Average Max Load	Maximum Max Load	MINORITY ROUTE
4	15	27	YES
5	4	9	NO
7	10	19	YES
9	14	37	YES
11	12	23	YES
14	14	26	YES
15	11	21	YES
16	5	8	YES
18	17	27	YES
19	17	27	NO
20	10	16	YES
22	4	7	YES
23	8	16	YES
32	5	7	YES
34	19	32	YES
35	14	30	YES
38	8	16	YES
52	20	37	YES
58	6	12	NO
59	11	25	NO
60	14	27	YES
61	10	20	YES
62	12	22	NO
65	7	11	NO
66L	20	42	NO
67	10	21	NO
68	6	12	NO
73	9	17	NO
74	12	26	YES
75	10	15	YES
76	11	23	NO
78	11	25	YES
79	14	28	YES
90	13	21	YES
100X	10	15	YES
300X	3	8	YES
355	6	18	YES
521 (52LX)	9	16	YES
777	13	56	NO
701/702 (JT NB & SB)	9	21	NO
703 (JTC)	8	17	NO
711 (Looper)	3	8	YES
812	3	8	NO

¹³ PSTA Urban Transportation Associates Report – Oct 2019 Bid Period

813	3	10	YES
814	3	7	NO
888	8	21	NO

Table B-5: PSTA Route Revenue Services and Ridership¹⁴

	Fiscal Year 2019	Fiscal Year 2019	Oct 2019 – Feb 2020 Average Daily Ridership	Oct 2019 – Feb 2020 Average Daily Ridership	Oct 2019 – Feb 2020 Average Daily Ridership
ROUTE	REVENUE HOURS	REVENUE MILES	Weekday	Saturday	Sunday
4	45,381	652,223	3,143	1,848	876
5	10,146	136,978	215	127	96
7	9,781	110,873	662	458	358
9	16,644	221,806	1,616	914	621
11	14,015	185,538	970	564	362
14	22,155	247,352	1,488	1,079	603
15	9,035	100,956	671	433	313
16	5,562	62,609	216	113	88
18	54,779	694,502	3,510	2,453	1,270
19	26,750	394,155	1,848	1,300	769
20	10,266	137,166	520	355	293
22	4,576	59,951	159	138	Not in Service
23	17,160	229,173	699	509	251
32	2,485	20,346	139	114	Not In Service
34	37,495	462,644	3,052	2,269	1,284
38	9,525	140,067	442	299	228
52	47,142	628,793	3,846	2,590	1,336
58	6,351	110,326	244	Not In Service	Not In Service
59	31,400	405,852	1,793	1,034	566
60	14,192	140,830	1,622	1,075	845
61	17,736	209,782	603	465	264
62	12,087	189,901	703	262	Not In Service
65	8,846	137,065	347	234	140
66L	3,489	55,511	172	Not In Service	Not In Service
67	7,630	128,860	443	346	Not In Service
68	5,618	90,111	221	212	165
73	7,956	126,522	450	303	Not In Service
74	24,495	338,848	1,290	702	378
75	10,192	133,846	528	417	312
76	7,508	83,839	392	338	Not In Service

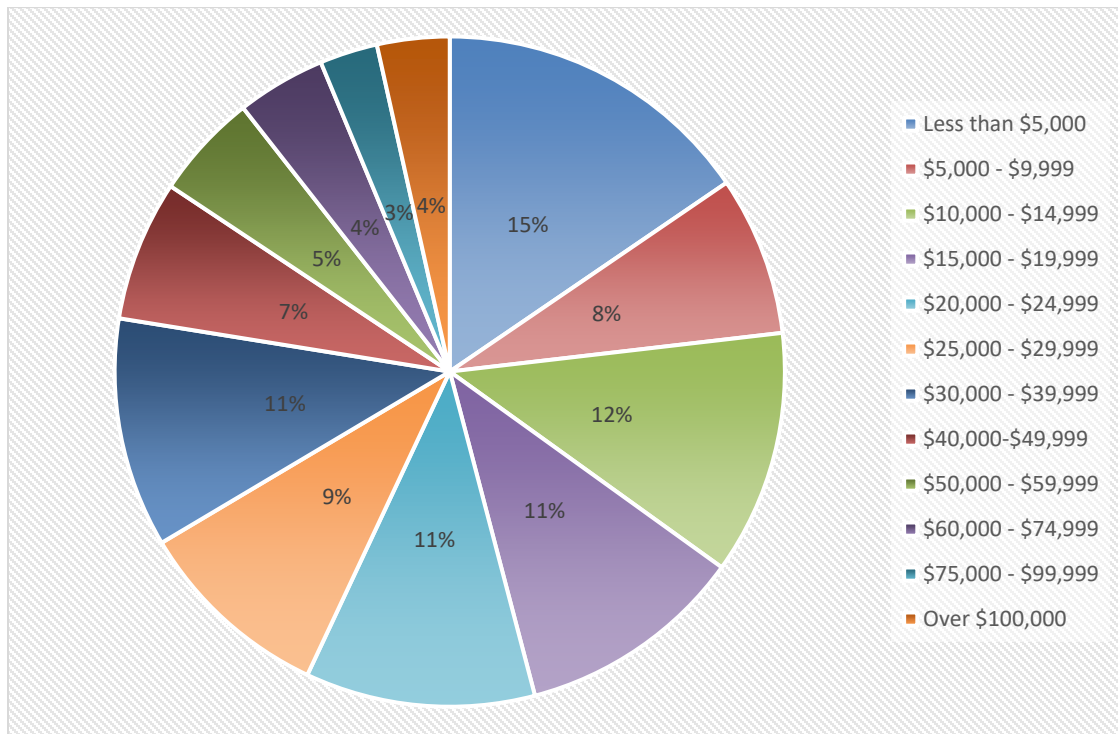
¹⁴ PSTA FY19 Service Report & PSTA Urban Transportation Associates Report – Oct 2019 Bid Period

ROUTE	REVENUE HOURS	REVENUE MILES	Weekday	Saturday	Sunday
78	11,609	158,528	926	880	493
79	29,674	390,402	1,643	839	463
90	1,673	30,337	83	85	76
100X	9,119	159,546	334	Not In Service	Not In Service
300X	6,536	111,826	180	Not In Service	Not In Service
Suncoast Beach Trolley SM	32,504	599,992	2,366	2,351	2,075
52LX	7,157	113,159	584	Not In Service	Not In Service
701/702	14,703	174,202	701	852	719
703	15,534	210,963	344	363	280
Looper	5,132	33,958	96	130	109
812	8,154	116,204	86	67	Not In Service
813	6,202	91,541	41	44	Not In Service
814	3,254	45,528	64	60	Not In Service

Table B-6: PSTA Rider's Household Income Distribution¹⁵

Annual Household Income	Percent of Respondents	Cumulative Percentage
Less than \$5,000	15.5%	15.5%
\$5,000 - \$9,999	7.7%	23.2%
\$10,000 - \$14,999	11.8%	34.9%
\$15,000 - \$19,999	11.0%	46.0%
\$20,000 - \$24,999	11.1%	57.0%
\$25,000 - \$29,999	9.5%	66.5%
\$30,000 - \$39,999	11.1%	77.6%
\$40,000-\$49,999	6.8%	84.4%
\$50,000 - \$59,999	5.1%	89.4%
\$60,000 - \$74,999	4.3%	93.7%
\$75,000 - \$99,999	2.8%	96.5%
Over \$100,000	3.5%	100.0%

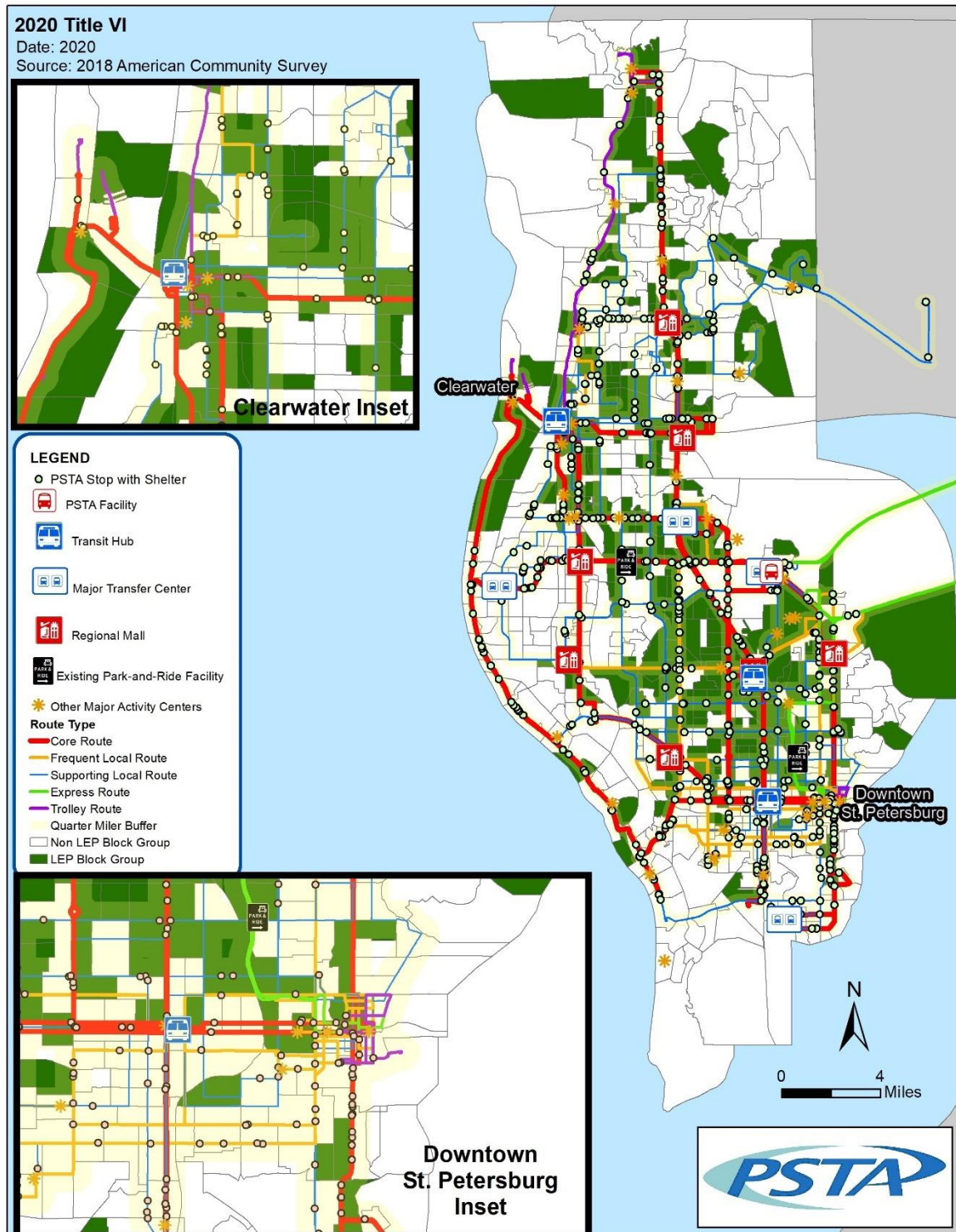
¹⁵ Source: 2018 PSTA On Board Survey

Figure B-1: PSTA Rider's Household Income Distribution¹⁶

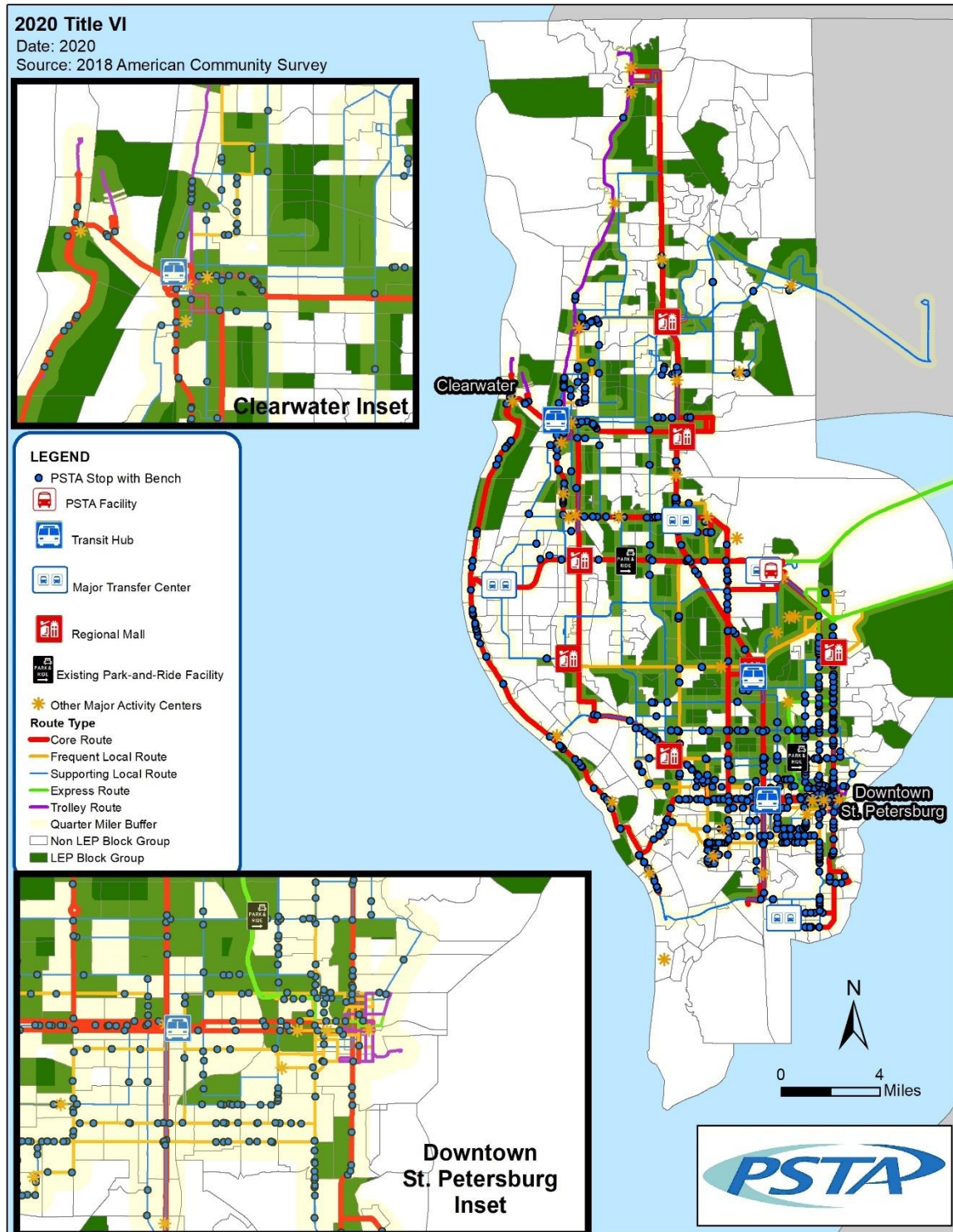
¹⁶ Source: 2018 PSTA On Board Survey

APPENDIX C: LEP Support Information

Map C-1: PSTA Shelters Distribution – LEP Block Groups



Map C-2: PSTA Bench Distribution – LEP Block Groups



**Table C-1: Pinellas County Percent of LEP Details by Census Block Group
(2014-2018 5-Year ACS)**

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030201011	0	10	0	0	1266	10	0.79%	No
121030201012	35	0	0	0	825	35	4.24%	No
121030201013	0	0	0	0	1878	0	0.00%	No
121030201014	0	0	0	0	660	0	0.00%	No
121030201051	35	0	79	8	1834	122	6.65%	Yes
121030201052	17	3	26	0	1768	46	2.60%	No
121030201053	10	0	0	19	1483	29	1.96%	No
121030201061	0	0	0	0	537	0	0.00%	No
121030201062	11	0	0	0	1443	11	0.76%	No
121030201063	0	0	0	0	1038	0	0.00%	No
121030201064	0	0	0	0	487	0	0.00%	No
121030201071	6	11	0	0	813	17	2.09%	No
121030201072	13	19	6	0	838	38	4.53%	No
121030201081	12	0	0	0	674	12	1.78%	No
121030201082	0	0	0	0	478	0	0.00%	No
121030201083	14	0	0	0	1086	14	1.29%	No
121030202011	30	0	0	0	2241	30	1.34%	No
121030202012	28	0	49	0	2110	77	3.65%	No
121030202013	21	0	0	0	806	21	2.61%	No
121030202021	0	0	0	0	653	0	0.00%	No
121030202022	17	15	0	0	1344	32	2.38%	No
121030202023	0	0	0	0	1304	0	0.00%	No
121030202061	0	13	10	0	2639	23	0.87%	No
121030202062	0	0	8	0	1658	8	0.48%	No
121030202071	0	0	8	0	2024	8	0.40%	No
121030202072	18	0	0	0	707	18	2.55%	No
121030202081	0	0	0	18	1317	18	1.37%	No
121030202082	0	0	0	0	948	0	0.00%	No
121030202091	10	29	0	0	1136	39	3.43%	No
121030202092	11	10	0	0	1526	21	1.38%	No
121030202093	11	0	0	0	613	11	1.79%	No
121030202094	0	0	0	0	1010	0	0.00%	No
121030203011	0	49	0	0	975	49	5.03%	No
121030203012	6	0	38	0	852	44	5.16%	Yes
121030203013	0	8	0	0	802	8	1.00%	No
121030203014	0	0	23	0	589	23	3.90%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030203021	0	11	0	0	927	11	1.19%	No
121030203022	0	30	7	0	1764	37	2.10%	No
121030203023	18	0	17	0	1105	35	3.17%	No
121030204001	0	0	0	0	715	0	0.00%	No
121030204002	10	0	0	0	773	10	1.29%	No
121030204003	0	0	0	0	860	0	0.00%	No
121030205001	0	0	0	0	390	0	0.00%	No
121030205002	0	0	0	0	1277	0	0.00%	No
121030205003	0	53	0	0	731	53	7.25%	Yes
121030205004	160	0	0	10	1401	170	12.13%	Yes
121030206001	0	0	0	0	991	0	0.00%	No
121030206002	0	0	0	0	1037	0	0.00%	No
121030206003	13	0	0	0	1201	13	1.08%	No
121030206004	0	0	0	11	505	11	2.18%	No
121030207001	8	0	0	0	261	8	3.07%	No
121030207002	0	12	0	0	970	12	1.24%	No
121030207003	0	0	0	0	703	0	0.00%	No
121030207004	11	0	0	0	1121	11	0.98%	No
121030208001	0	0	0	0	782	0	0.00%	No
121030208002	0	0	0	0	558	0	0.00%	No
121030208003	0	21	0	0	1146	21	1.83%	No
121030208004	0	0	0	0	933	0	0.00%	No
121030208005	0	0	0	0	687	0	0.00%	No
121030208006	0	0	0	0	1008	0	0.00%	No
121030212001	0	0	0	0	454	0	0.00%	No
121030212002	0	0	0	0	458	0	0.00%	No
121030212003	16	0	0	0	1135	16	1.41%	No
121030212004	0	0	0	0	864	0	0.00%	No
121030215001	0	17	70	0	1167	87	7.46%	Yes
121030215002	0	0	0	0	370	0	0.00%	No
121030215003	0	14	0	0	1783	14	0.79%	No
121030216001	21	10	0	0	575	31	5.39%	Yes
121030216002	42	0	0	10	666	52	7.81%	Yes
121030216003	6	0	0	0	1197	6	0.50%	No
121030218001	8	5	0	0	686	13	1.90%	No
121030218002	0	0	0	0	847	0	0.00%	No
121030218003	0	0	0	0	202	0	0.00%	No
121030218004	9	0	0	0	1033	9	0.87%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030219001	0	0	0	0	606	0	0.00%	No
121030219002	0	12	0	0	642	12	1.87%	No
121030219003	29	0	0	0	526	29	5.51%	Yes
121030219004	0	0	0	0	270	0	0.00%	No
121030219005	0	12	0	0	732	12	1.64%	No
121030220001	0	0	0	0	848	0	0.00%	No
121030220002	0	0	0	0	450	0	0.00%	No
121030220003	0	0	0	0	728	0	0.00%	No
121030220004	0	0	20	0	1005	20	1.99%	No
121030221001	35	66	0	0	886	101	11.40%	Yes
121030221002	0	0	0	0	809	0	0.00%	No
121030221003	0	359	0	0	825	359	43.52%	Yes
121030221004	0	0	0	0	955	0	0.00%	No
121030221005	0	0	0	0	1090	0	0.00%	No
121030222001	0	0	12	0	1035	12	1.16%	No
121030222002	116	100	12	0	1159	228	19.67%	Yes
121030222003	193	0	0	0	1368	193	14.11%	Yes
121030222004	0	0	0	0	760	0	0.00%	No
121030223011	0	11	0	0	1137	11	0.97%	No
121030223012	34	8	0	0	1234	42	3.40%	No
121030223013	0	0	0	0	594	0	0.00%	No
121030223021	0	75	14	0	1111	89	8.01%	Yes
121030223022	0	9	0	0	1001	9	0.90%	No
121030223023	24	23	0	0	1622	47	2.90%	No
121030224011	0	0	16	0	894	16	1.79%	No
121030224012	0	0	18	0	1339	18	1.34%	No
121030224013	48	6	0	0	628	54	8.60%	Yes
121030224014	37	0	0	0	673	37	5.50%	Yes
121030224021	0	0	0	0	404	0	0.00%	No
121030224022	0	0	10	0	1425	10	0.70%	No
121030224023	0	19	0	0	394	19	4.82%	No
121030224024	33	0	0	0	652	33	5.06%	No
121030224025	0	0	0	0	950	0	0.00%	No
121030224026	0	0	0	0	620	0	0.00%	No
121030225011	93	35	12	0	2096	140	6.68%	Yes
121030225012	2	0	0	0	863	2	0.23%	No
121030225013	79	18	88	0	2052	185	9.02%	Yes
121030225021	112	0	0	0	1044	112	10.73%	Yes

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030225022	0	0	0	0	791	0	0.00%	No
121030225023	68	14	71	0	1801	153	8.50%	Yes
121030225031	0	0	0	0	1937	0	0.00%	No
121030225032	0	68	82	0	1439	150	10.42%	Yes
121030225033	67	0	0	0	1906	67	3.52%	No
121030226011	9	17	30	0	1239	56	4.52%	No
121030226012	42	0	29	26	1030	97	9.42%	Yes
121030226013	108	0	112	0	1300	220	16.92%	Yes
121030226021	29	244	10	0	1682	283	16.83%	Yes
121030226022	11	0	21	0	1101	32	2.91%	No
121030226023	7	18	70	0	1636	95	5.81%	Yes
121030227001	17	65	180	0	1753	262	14.95%	Yes
121030227002	68	9	0	0	1559	77	4.94%	No
121030227003	12	0	25	0	686	37	5.39%	Yes
121030228011	137	65	124	0	2106	326	15.48%	Yes
121030228012	70	22	18	0	1185	110	9.28%	Yes
121030228013	54	17	31	33	1269	135	10.64%	Yes
121030228021	18	57	53	0	1110	128	11.53%	Yes
121030228022	52	0	90	104	1196	246	20.57%	Yes
121030228023	9	0	0	67	1237	76	6.14%	Yes
121030229011	0	16	146	0	2173	162	7.46%	Yes
121030229012	13	33	0	0	706	46	6.52%	Yes
121030229021	0	40	72	0	1087	112	10.30%	Yes
121030229022	0	0	23	0	651	23	3.53%	No
121030229023	28	10	265	0	1098	303	27.60%	Yes
121030230001	48	0	77	0	1215	125	10.29%	Yes
121030230002	37	10	89	0	1164	136	11.68%	Yes
121030231001	31	0	203	0	1136	234	20.60%	Yes
121030231002	46	0	52	0	1094	98	8.96%	Yes
121030232001	19	14	25	0	891	58	6.51%	Yes
121030232002	0	0	0	0	974	0	0.00%	No
121030232003	0	0	0	0	719	0	0.00%	No
121030233001	0	0	13	0	1087	13	1.20%	No
121030233002	13	0	0	0	484	13	2.69%	No
121030233003	0	0	0	0	713	0	0.00%	No
121030234001	0	31	0	0	665	31	4.66%	No
121030234002	36	9	18	0	951	63	6.62%	Yes
121030235001	50	45	0	0	924	95	10.28%	Yes

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030235002	24	0	0	0	782	24	3.07%	No
121030235003	27	0	0	0	1381	27	1.96%	No
121030236001	0	21	0	0	548	21	3.83%	No
121030236002	0	0	0	0	1259	0	0.00%	No
121030236003	0	0	0	0	1343	0	0.00%	No
121030237001	0	8	0	0	1000	8	0.80%	No
121030237002	0	0	0	0	577	0	0.00%	No
121030237003	22	24	0	0	901	46	5.11%	Yes
121030238001	0	11	0	0	1084	11	1.01%	No
121030238002	0	0	11	0	1315	11	0.84%	No
121030239001	49	7	0	0	779	56	7.19%	Yes
121030239002	9	0	0	0	1184	9	0.76%	No
121030240011	0	0	0	0	1350	0	0.00%	No
121030240012	23	12	1	11	1560	47	3.01%	No
121030240021	0	0	14	0	1672	14	0.84%	No
121030240022	138	0	0	0	1498	138	9.21%	Yes
121030240023	15	0	0	0	2365	15	0.63%	No
121030240041	42	0	19	0	2549	61	2.39%	No
121030240042	0	0	0	0	1647	0	0.00%	No
121030240043	0	0	0	0	955	0	0.00%	No
121030240051	0	34	0	0	1650	34	2.06%	No
121030240052	0	67	0	0	1286	67	5.21%	Yes
121030241001	62	0	0	0	590	62	10.51%	Yes
121030241002	0	0	0	0	1444	0	0.00%	No
121030241003	15	97	0	0	1058	112	10.59%	Yes
121030241004	40	232	0	0	1333	272	20.41%	Yes
121030242001	28	0	25	0	1231	53	4.31%	No
121030242002	0	33	0	0	1367	33	2.41%	No
121030242003	0	0	2	0	469	2	0.43%	No
121030242004	41	0	115	33	917	189	20.61%	Yes
121030242005	31	0	0	0	854	31	3.63%	No
121030243011	22	10	0	0	1458	32	2.19%	No
121030243012	0	10	44	0	1041	54	5.19%	Yes
121030243013	0	9	0	0	1077	9	0.84%	No
121030243014	0	0	0	0	628	0	0.00%	No
121030243021	15	0	67	0	1069	82	7.67%	Yes
121030243022	9	45	102	0	2055	156	7.59%	Yes
121030243023	37	158	66	0	1093	261	23.88%	Yes

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030244031	5	22	0	0	971	27	2.78%	No
121030244032	71	60	46	0	1861	177	9.51%	Yes
121030244033	14	109	9	0	1245	132	10.60%	Yes
121030244061	152	74	0	0	1847	226	12.24%	Yes
121030244062	8	9	0	1	1696	18	1.06%	No
121030244063	44	61	21	0	1678	126	7.51%	Yes
121030244081	23	46	0	0	1710	69	4.04%	No
121030244082	38	86	0	0	1396	124	8.88%	Yes
121030244083	16	32	0	0	883	48	5.44%	Yes
121030244091	38	0	18	0	1619	56	3.46%	No
121030244092	0	0	0	0	1216	0	0.00%	No
121030244101	38	91	0	107	1875	236	12.59%	Yes
121030244102	0	77	29	0	1443	106	7.35%	Yes
121030244111	23	9	0	0	304	32	10.53%	Yes
121030244112	20	19	0	11	2016	50	2.48%	No
121030244113	0	0	0	0	842	0	0.00%	No
121030244114	0	28	0	0	778	28	3.60%	No
121030244121	17	2	18	0	3402	37	1.09%	No
121030244122	43	0	18	0	583	61	10.46%	Yes
121030244131	0	119	18	0	1479	137	9.26%	Yes
121030244132	0	0	0	0	654	0	0.00%	No
121030244133	14	66	0	0	2103	80	3.80%	No
121030244134	0	72	0	0	708	72	10.17%	Yes
121030245051	2	0	0	0	898	2	0.22%	No
121030245052	99	0	73	0	2494	172	6.90%	Yes
121030245053	0	74	21	0	1104	95	8.61%	Yes
121030245054	21	0	193	0	2129	214	10.05%	Yes
121030245071	59	10	17	10	2138	96	4.49%	No
121030245072	35	78	0	0	1468	113	7.70%	Yes
121030245081	178	0	30	0	3168	208	6.57%	Yes
121030245082	0	31	15	0	1796	46	2.56%	No
121030245091	0	9	0	0	884	9	1.02%	No
121030245092	0	79	15	0	1275	94	7.37%	Yes
121030245093	31	0	0	0	1317	31	2.35%	No
121030245101	14	0	54	0	868	68	7.83%	Yes
121030245102	333	0	25	31	1997	389	19.48%	Yes
121030245103	0	0	0	0	2449	0	0.00%	No
121030245111	64	0	16	0	2392	80	3.34%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030245112	0	0	0	0	425	0	0.00%	No
121030245113	128	39	0	0	5948	167	2.81%	No
121030245121	14	8	0	0	954	22	2.31%	No
121030245122	31	33	42	0	2178	106	4.87%	No
121030245131	0	15	0	0	966	15	1.55%	No
121030245132	16	0	0	0	531	16	3.01%	No
121030245133	0	114	0	0	2151	114	5.30%	Yes
121030245141	68	0	37	0	971	105	10.81%	Yes
121030245142	179	26	9	0	2009	214	10.65%	Yes
121030245143	127	0	53	0	1573	180	11.44%	Yes
121030246011	6	7	81	0	1656	94	5.68%	Yes
121030246012	0	20	0	0	1019	20	1.96%	No
121030246013	44	9	23	0	989	76	7.68%	Yes
121030246021	92	0	45	0	1179	137	11.62%	Yes
121030246022	0	214	0	0	1417	214	15.10%	Yes
121030246023	27	19	82	0	1899	128	6.74%	Yes
121030246024	0	51	61	0	826	112	13.56%	Yes
121030247011	27	9	190	0	1225	226	18.45%	Yes
121030247012	0	44	113	0	695	157	22.59%	Yes
121030247013	138	39	71	0	1482	248	16.73%	Yes
121030247021	0	0	7	0	371	7	1.89%	No
121030247022	26	0	0	0	785	26	3.31%	No
121030247023	142	15	0	4	893	161	18.03%	Yes
121030247031	22	0	57	0	1423	79	5.55%	Yes
121030247032	0	28	9	0	1110	37	3.33%	No
121030247033	17	11	31	0	509	59	11.59%	Yes
121030248011	75	15	49	0	1989	139	6.99%	Yes
121030248012	24	24	0	34	2042	82	4.02%	No
121030248031	13	11	33	0	746	57	7.64%	Yes
121030248032	46	9	160	0	1622	215	13.26%	Yes
121030248041	158	10	189	0	2065	357	17.29%	Yes
121030248051	44	5	415	0	1381	464	33.60%	Yes
121030248052	173	18	0	0	1220	191	15.66%	Yes
121030249011	143	17	101	0	1172	261	22.27%	Yes
121030249012	23	0	0	29	2217	52	2.35%	No
121030249013	38	37	119	0	1954	194	9.93%	Yes
121030249021	57	56	45	0	1582	158	9.99%	Yes
121030249022	132	0	0	89	1004	221	22.01%	Yes

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030249023	159	26	94	0	2245	279	12.43%	Yes
121030249024	125	0	132	0	1657	257	15.51%	Yes
121030249041	35	7	90	0	2217	132	5.95%	Yes
121030249042	26	0	109	20	1223	155	12.67%	Yes
121030249051	124	0	74	0	2529	198	7.83%	Yes
121030249052	39	15	98	0	2859	152	5.32%	Yes
121030249053	0	0	0	0	1016	0	0.00%	No
121030249061	100	0	53	0	2119	153	7.22%	Yes
121030249062	20	0	30	0	979	50	5.11%	Yes
121030249063	27	0	18	0	567	45	7.94%	Yes
121030250041	21	111	41	0	1599	173	10.82%	Yes
121030250042	38	59	0	0	1520	97	6.38%	Yes
121030250043	45	0	200	0	2053	245	11.93%	Yes
121030250044	82	32	0	25	862	139	16.13%	Yes
121030250071	0	0	22	0	859	22	2.56%	No
121030250072	19	20	0	0	2065	39	1.89%	No
121030250073	23	0	0	0	1058	23	2.17%	No
121030250091	13	15	103	0	2079	131	6.30%	Yes
121030250092	56	47	79	0	1895	182	9.60%	Yes
121030250101	0	0	27	0	1210	27	2.23%	No
121030250102	0	5	0	0	866	5	0.58%	No
121030250103	7	26	25	0	904	58	6.42%	Yes
121030250104	38	47	45	0	1716	130	7.58%	Yes
121030250111	102	19	25	8	2427	154	6.35%	Yes
121030250112	24	9	11	22	1350	66	4.89%	No
121030250113	0	0	0	0	1404	0	0.00%	No
121030250121	0	17	0	0	1395	17	1.22%	No
121030250122	0	0	62	0	1525	62	4.07%	No
121030250123	34	0	0	0	2272	34	1.50%	No
121030250131	10	18	26	0	1711	54	3.16%	No
121030250132	17	26	0	0	939	43	4.58%	No
121030250133	66	52	16	0	1235	134	10.85%	Yes
121030250141	30	47	71	0	2167	148	6.83%	Yes
121030250142	22	0	89	0	613	111	18.11%	Yes
121030250143	17	0	83	0	1633	100	6.12%	Yes
121030250151	0	58	17	0	1282	75	5.85%	Yes
121030250152	11	11	0	0	1500	22	1.47%	No
121030250161	63	70	9	5	2052	147	7.16%	Yes

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030250171	34	14	27	0	1375	75	5.45%	Yes
121030250172	0	0	29	0	1088	29	2.67%	No
121030250181	0	16	39	0	568	55	9.68%	Yes
121030250182	27	1	0	0	671	28	4.17%	No
121030250183	41	0	9	0	871	50	5.74%	Yes
121030250191	0	0	0	0	513	0	0.00%	No
121030250192	38	18	0	0	1657	56	3.38%	No
121030251061	20	0	0	0	869	20	2.30%	No
121030251062	14	13	23	0	1431	50	3.49%	No
121030251071	0	0	0	0	712	0	0.00%	No
121030251072	0	31	41	59	1479	131	8.86%	Yes
121030251073	11	17	0	0	1631	28	1.72%	No
121030251081	0	0	15	0	1042	15	1.44%	No
121030251082	0	22	0	25	1034	47	4.55%	No
121030251091	0	20	13	0	971	33	3.40%	No
121030251092	0	65	56	0	1639	121	7.38%	Yes
121030251093	8	26	19	0	1393	53	3.80%	No
121030251101	0	0	0	0	1323	0	0.00%	No
121030251102	106	0	0	0	851	106	12.46%	Yes
121030251103	0	0	0	0	1118	0	0.00%	No
121030251104	0	15	0	0	1549	15	0.97%	No
121030251111	0	31	0	0	1219	31	2.54%	No
121030251112	4	0	0	0	521	4	0.77%	No
121030251113	24	0	0	0	1252	24	1.92%	No
121030251121	36	0	0	0	932	36	3.86%	No
121030251122	0	27	0	0	1235	27	2.19%	No
121030251123	0	12	10	0	1178	22	1.87%	No
121030251131	0	0	6	0	927	6	0.65%	No
121030251132	37	0	0	0	630	37	5.87%	Yes
121030251133	0	0	0	0	1103	0	0.00%	No
121030251141	0	4	0	0	1740	4	0.23%	No
121030251142	0	17	0	0	1316	17	1.29%	No
121030251151	0	11	8	7	1896	26	1.37%	No
121030251152	13	7	8	0	1207	28	2.32%	No
121030251161	0	0	0	0	663	0	0.00%	No
121030251162	0	5	0	0	1296	5	0.39%	No
121030251191	11	45	0	0	2430	56	2.30%	No
121030251192	0	27	0	0	1038	27	2.60%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030251193	28	13	0	0	1947	41	2.11%	No
121030251201	0	0	0	0	1247	0	0.00%	No
121030251202	0	0	0	0	771	0	0.00%	No
121030251203	0	0	0	0	1409	0	0.00%	No
121030251211	0	82	17	0	2361	99	4.19%	No
121030251212	0	54	19	0	2079	73	3.51%	No
121030251221	0	20	0	0	1832	20	1.09%	No
121030251222	0	0	10	0	1816	10	0.55%	No
121030251223	0	15	0	0	1725	15	0.87%	No
121030251231	6	0	0	13	1090	19	1.74%	No
121030251232	0	0	0	0	715	0	0.00%	No
121030252031	0	76	0	0	2457	76	3.09%	No
121030252032	0	0	0	0	1101	0	0.00%	No
121030252033	13	17	19	0	2128	49	2.30%	No
121030252041	0	20	19	0	2216	39	1.76%	No
121030252042	0	21	0	0	1107	21	1.90%	No
121030252051	0	0	0	0	1054	0	0.00%	No
121030252052	0	38	0	0	1777	38	2.14%	No
121030252053	0	12	0	0	1043	12	1.15%	No
121030252071	12	0	43	0	1981	55	2.78%	No
121030252072	121	0	0	0	3297	121	3.67%	No
121030252073	0	27	0	0	1301	27	2.08%	No
121030252081	5	0	0	0	615	5	0.81%	No
121030252082	0	12	0	0	1003	12	1.20%	No
121030252091	20	0	0	0	2799	20	0.71%	No
121030252092	45	0	0	0	1198	45	3.76%	No
121030252093	0	0	0	0	540	0	0.00%	No
121030253031	89	0	0	0	1458	89	6.10%	Yes
121030253032	0	0	0	0	2087	0	0.00%	No
121030253033	0	0	0	0	1571	0	0.00%	No
121030253041	0	0	0	0	1092	0	0.00%	No
121030253042	13	0	0	0	773	13	1.68%	No
121030253043	10	0	8	0	1158	18	1.55%	No
121030253051	0	11	0	0	1342	11	0.82%	No
121030253052	144	37	0	0	1529	181	11.84%	Yes
121030253061	0	36	16	7	1473	59	4.01%	No
121030253071	12	63	0	0	1588	75	4.72%	No
121030253072	11	14	16	0	2070	41	1.98%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030253073	0	0	0	0	611	0	0.00%	No
121030253081	0	25	8	0	747	33	4.42%	No
121030253082	33	18	0	0	1455	51	3.51%	No
121030254011	0	47	0	0	1508	47	3.12%	No
121030254012	9	0	0	0	1026	9	0.88%	No
121030254013	10	130	0	0	1294	140	10.82%	Yes
121030254014	0	16	0	0	851	16	1.88%	No
121030254051	0	16	0	0	508	16	3.15%	No
121030254052	15	18	0	0	1331	33	2.48%	No
121030254053	0	16	0	0	1994	16	0.80%	No
121030254071	0	68	50	0	1692	118	6.97%	Yes
121030254072	13	358	21	0	1900	392	20.63%	Yes
121030254073	0	0	0	0	1714	0	0.00%	No
121030254081	202	75	0	0	1391	277	19.91%	Yes
121030254082	0	0	0	0	1112	0	0.00%	No
121030254083	206	47	0	0	3084	253	8.20%	Yes
121030254111	178	9	8	0	1903	195	10.25%	Yes
121030254121	62	113	0	52	1435	227	15.82%	Yes
121030254122	0	0	114	0	1408	114	8.10%	Yes
121030254123	0	0	0	0	616	0	0.00%	No
121030254124	0	15	0	0	1280	15	1.17%	No
121030254131	21	0	8	16	858	45	5.24%	Yes
121030254132	12	0	30	0	768	42	5.47%	Yes
121030254133	0	60	0	0	1196	60	5.02%	No
121030254141	75	25	0	0	711	100	14.06%	Yes
121030254142	13	42	0	0	1598	55	3.44%	No
121030254151	0	0	26	25	1201	51	4.25%	No
121030254152	310	112	15	0	3262	437	13.40%	Yes
121030254161	53	48	32	0	1573	133	8.46%	Yes
121030254162	41	22	29	0	1730	92	5.32%	Yes
121030254171	0	0	0	0	846	0	0.00%	No
121030254172	9	16	0	0	1576	25	1.59%	No
121030255011	12	109	7	0	1386	128	9.24%	Yes
121030255012	0	42	0	0	1907	42	2.20%	No
121030255013	14	45	0	14	742	73	9.84%	Yes
121030255031	29	0	18	0	2083	47	2.26%	No
121030255032	15	0	0	0	1253	15	1.20%	No
121030255033	89	0	23	0	1667	112	6.72%	Yes

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030255051	208	125	5	0	2595	338	13.03%	Yes
121030255061	16	0	0	0	1074	16	1.49%	No
121030255062	302	0	0	0	1786	302	16.91%	Yes
121030255063	0	0	0	0	790	0	0.00%	No
121030255064	114	0	0	0	2100	114	5.43%	Yes
121030256021	46	10	16	0	1102	72	6.53%	Yes
121030256022	35	14	9	0	1195	58	4.85%	No
121030256023	0	26	0	11	605	37	6.12%	Yes
121030256031	62	0	0	34	619	96	15.51%	Yes
121030256032	0	0	0	0	478	0	0.00%	No
121030256033	11	0	50	0	1308	61	4.66%	No
121030256041	73	20	7	0	1313	100	7.62%	Yes
121030257001	4	45	0	0	752	49	6.52%	Yes
121030257002	0	23	0	0	1010	23	2.28%	No
121030257003	0	0	0	0	1475	0	0.00%	No
121030257004	0	0	21	0	776	21	2.71%	No
121030258001	119	17	0	0	1257	136	10.82%	Yes
121030258002	187	0	24	0	1536	211	13.74%	Yes
121030258003	33	0	0	0	1419	33	2.33%	No
121030259001	121	29	0	0	1470	150	10.20%	Yes
121030259002	0	0	0	0	592	0	0.00%	No
121030259003	0	0	0	48	525	48	9.14%	Yes
121030259004	168	50	38	0	1327	256	19.29%	Yes
121030259005	0	48	0	0	419	48	11.46%	Yes
121030259006	0	0	0	0	690	0	0.00%	No
121030260011	10	49	5	0	1114	64	5.75%	Yes
121030260012	0	0	0	0	1039	0	0.00%	No
121030260013	0	0	8	0	739	8	1.08%	No
121030260021	0	40	0	0	1117	40	3.58%	No
121030260022	0	17	0	0	542	17	3.14%	No
121030260023	28	66	0	0	1068	94	8.80%	Yes
121030261011	20	51	8	18	973	97	9.97%	Yes
121030261012	10	37	0	0	374	47	12.57%	Yes
121030261013	27	14	0	0	782	41	5.24%	Yes
121030261021	0	30	0	0	795	30	3.77%	No
121030261022	6	0	1	0	476	7	1.47%	No
121030262001	36	0	0	0	967	36	3.72%	No
121030262002	5	0	0	0	875	5	0.57%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030263001	138	0	0	0	1179	138	11.70%	Yes
121030263002	463	136	0	0	2201	599	27.21%	Yes
121030263003	0	15	0	0	787	15	1.91%	No
121030263004	0	0	0	0	1701	0	0.00%	No
121030263005	0	0	0	0	1008	0	0.00%	No
121030263006	27	0	30	0	592	57	9.63%	Yes
121030264001	301	0	36	0	921	337	36.59%	Yes
121030264002	273	0	0	0	2143	273	12.74%	Yes
121030264003	102	0	0	0	1190	102	8.57%	Yes
121030264004	0	36	0	0	882	36	4.08%	No
121030264005	125	0	0	0	1092	125	11.45%	Yes
121030265001	58	26	0	0	688	84	12.21%	Yes
121030265002	49	29	0	33	1780	111	6.24%	Yes
121030265003	218	0	0	0	1427	218	15.28%	Yes
121030265004	0	0	0	0	492	0	0.00%	No
121030265005	19	0	0	0	378	19	5.03%	No
121030265006	47	0	0	0	2096	47	2.24%	No
121030266011	37	249	0	0	659	286	43.40%	Yes
121030266012	0	0	0	0	558	0	0.00%	No
121030266013	4	8	8	0	1080	20	1.85%	No
121030266014	0	12	0	0	950	12	1.26%	No
121030266021	76	7	0	0	993	83	8.36%	Yes
121030266022	23	10	0	0	1152	33	2.86%	No
121030267011	126	10	0	0	1738	136	7.83%	Yes
121030267012	88	9	0	0	1017	97	9.54%	Yes
121030267013	0	20	76	0	798	96	12.03%	Yes
121030267014	43	36	10	0	996	89	8.94%	Yes
121030267021	240	31	21	0	1191	292	24.52%	Yes
121030267022	71	3	0	0	1990	74	3.72%	No
121030267023	17	26	0	0	782	43	5.50%	Yes
121030267024	0	0	0	0	544	0	0.00%	No
121030267025	0	0	0	0	1089	0	0.00%	No
121030267026	0	0	0	0	1027	0	0.00%	No
121030267031	26	28	0	0	891	54	6.06%	Yes
121030267032	17	0	8	0	1129	25	2.21%	No
121030267033	169	0	0	0	1341	169	12.60%	Yes
121030267034	123	16	0	0	1059	139	13.13%	Yes
121030267035	336	41	0	0	2134	377	17.67%	Yes

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030268041	122	0	0	0	2606	122	4.68%	No
121030268042	60	78	0	0	1386	138	9.96%	Yes
121030268043	0	0	0	0	1337	0	0.00%	No
121030268091	15	20	0	0	1000	35	3.50%	No
121030268092	8	0	0	0	1727	8	0.46%	No
121030268111	33	0	0	15	699	48	6.87%	Yes
121030268112	23	27	0	0	2117	50	2.36%	No
121030268113	0	0	38	0	2008	38	1.89%	No
121030268114	14	45	0	0	1097	59	5.38%	Yes
121030268121	68	45	47	0	2612	160	6.13%	Yes
121030268122	81	41	43	0	1946	165	8.48%	Yes
121030268131	37	50	18	0	2190	105	4.79%	No
121030268132	325	0	0	0	1503	325	21.62%	Yes
121030268141	10	29	0	0	2246	39	1.74%	No
121030268151	45	0	0	0	1725	45	2.61%	No
121030268152	7	0	0	0	1557	7	0.45%	No
121030268153	34	15	17	0	1196	66	5.52%	Yes
121030268161	30	12	61	0	1010	103	10.20%	Yes
121030268162	21	0	0	0	702	21	2.99%	No
121030268163	0	16	0	0	676	16	2.37%	No
121030268164	0	0	0	14	1755	14	0.80%	No
121030268165	0	1	0	0	1297	1	0.08%	No
121030268171	0	0	40	0	1856	40	2.16%	No
121030268172	86	0	46	0	1951	132	6.77%	Yes
121030268173	15	0	0	0	1431	15	1.05%	No
121030268181	90	0	15	0	2033	105	5.16%	Yes
121030268182	479	0	0	8	1558	487	31.26%	Yes
121030268183	74	0	0	0	605	74	12.23%	Yes
121030268191	23	29	0	0	910	52	5.71%	Yes
121030268192	431	28	0	44	1542	503	32.62%	Yes
121030268201	48	0	0	0	1334	48	3.60%	No
121030268202	54	0	0	0	1776	54	3.04%	No
121030268203	56	29	27	0	1561	112	7.17%	Yes
121030268211	100	21	0	16	2678	137	5.12%	Yes
121030269041	90	0	0	0	1418	90	6.35%	Yes
121030269042	290	0	92	13	1765	395	22.38%	Yes
121030269043	0	0	32	0	1359	32	2.35%	No
121030269071	6	12	0	0	1638	18	1.10%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030269072	0	18	0	0	2185	18	0.82%	No
121030269073	0	34	20	0	1711	54	3.16%	No
121030269081	16	8	0	0	665	24	3.61%	No
121030269082	35	0	0	0	1140	35	3.07%	No
121030269083	0	0	0	24	1050	24	2.29%	No
121030269084	3	13	0	0	1142	16	1.40%	No
121030269091	66	16	0	0	1436	82	5.71%	Yes
121030269092	13	24	0	0	1710	37	2.16%	No
121030269093	9	0	8	0	1543	17	1.10%	No
121030269101	0	18	0	0	731	18	2.46%	No
121030269102	129	0	0	0	2775	129	4.65%	No
121030269103	0	0	42	0	1420	42	2.96%	No
121030269104	0	15	0	0	835	15	1.80%	No
121030269111	0	14	0	0	1660	14	0.84%	No
121030269112	19	0	0	0	805	19	2.36%	No
121030269113	0	50	0	0	1278	50	3.91%	No
121030269121	56	0	0	0	619	56	9.05%	Yes
121030269122	0	15	0	0	1226	15	1.22%	No
121030269123	38	17	0	0	1746	55	3.15%	No
121030269124	0	0	0	0	709	0	0.00%	No
121030269131	22	17	0	0	927	39	4.21%	No
121030269132	24	0	0	0	435	24	5.52%	Yes
121030269133	7	0	0	0	601	7	1.16%	No
121030269134	45	20	29	0	1086	94	8.66%	Yes
121030270001	35	13	0	0	1721	48	2.79%	No
121030270002	0	0	0	0	797	0	0.00%	No
121030270003	0	0	0	0	413	0	0.00%	No
121030270004	92	94	0	0	2164	186	8.60%	Yes
121030271011	27	0	43	0	1690	70	4.14%	No
121030271012	17	8	0	0	1661	25	1.51%	No
121030271013	68	26	0	0	464	94	20.26%	Yes
121030271051	0	0	0	0	1441	0	0.00%	No
121030271052	36	0	0	0	1767	36	2.04%	No
121030271061	109	0	0	0	1979	109	5.51%	Yes
121030271062	14	31	0	0	1171	45	3.84%	No
121030271063	20	29	0	0	1109	49	4.42%	No
121030271064	0	0	0	0	507	0	0.00%	No
121030272021	0	0	0	0	875	0	0.00%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030272022	41	0	0	0	1006	41	4.08%	No
121030272023	40	0	0	0	1750	40	2.29%	No
121030272024	0	0	0	0	743	0	0.00%	No
121030272025	37	0	0	0	930	37	3.98%	No
121030272041	11	14	17	0	1493	42	2.81%	No
121030272042	0	0	0	0	714	0	0.00%	No
121030272043	35	31	75	0	2667	141	5.29%	Yes
121030272051	9	0	0	0	2292	9	0.39%	No
121030272052	0	0	0	0	1469	0	0.00%	No
121030272053	171	44	11	58	2146	284	13.23%	Yes
121030272054	12	0	0	0	576	12	2.08%	No
121030272061	16	23	0	0	1686	39	2.31%	No
121030272062	26	118	0	0	2026	144	7.11%	Yes
121030272063	0	0	36	0	2398	36	1.50%	No
121030272071	24	93	0	0	2533	117	4.62%	No
121030272072	9	21	38	0	589	68	11.54%	Yes
121030272073	0	0	10	0	783	10	1.28%	No
121030272074	34	15	17	0	1075	66	6.14%	Yes
121030272081	0	18	0	0	876	18	2.05%	No
121030272082	103	0	0	0	2617	103	3.94%	No
121030272083	0	48	0	14	1703	62	3.64%	No
121030272084	0	13	0	0	1969	13	0.66%	No
121030272091	0	0	0	0	384	0	0.00%	No
121030272092	17	0	0	0	810	17	2.10%	No
121030272101	39	53	0	0	1111	92	8.28%	Yes
121030272102	0	117	0	0	1274	117	9.18%	Yes
121030272103	0	18	0	0	837	18	2.15%	No
121030272104	0	144	0	77	729	221	30.32%	Yes
121030272105	0	0	0	0	715	0	0.00%	No
121030273081	0	0	0	0	1174	0	0.00%	No
121030273082	12	6	0	0	2543	18	0.71%	No
121030273091	34	5	7	0	1868	46	2.46%	No
121030273101	48	15	0	0	1977	63	3.19%	No
121030273102	28	19	0	0	1600	47	2.94%	No
121030273103	67	100	0	0	3167	167	5.27%	Yes
121030273104	0	0	0	14	1691	14	0.83%	No
121030273141	23	0	35	22	2137	80	3.74%	No
121030273142	0	0	0	0	1416	0	0.00%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030273151	57	0	13	0	2074	70	3.38%	No
121030273152	10	0	0	0	1220	10	0.82%	No
121030273153	0	0	17	0	866	17	1.96%	No
121030273154	41	25	0	16	1703	82	4.82%	No
121030273161	10	9	9	0	1301	28	2.15%	No
121030273162	38	41	0	9	1907	88	4.61%	No
121030273163	9	0	60	0	636	69	10.85%	Yes
121030273171	28	21	0	0	1383	49	3.54%	No
121030273172	7	19	0	0	1845	26	1.41%	No
121030273173	139	62	0	0	1947	201	10.32%	Yes
121030273181	20	39	0	0	1563	59	3.77%	No
121030273182	19	0	0	0	2315	19	0.82%	No
121030273191	59	0	0	43	1581	102	6.45%	Yes
121030273192	42	33	0	0	1848	75	4.06%	No
121030273193	72	0	0	0	1419	72	5.07%	No
121030273201	28	24	0	0	1160	52	4.48%	No
121030273202	0	8	18	0	2051	26	1.27%	No
121030273203	0	0	0	0	665	0	0.00%	No
121030273211	16	38	0	0	1506	54	3.59%	No
121030273221	0	37	0	0	2741	37	1.35%	No
121030273222	0	0	0	0	635	0	0.00%	No
121030273223	0	0	0	0	263	0	0.00%	No
121030273224	0	22	34	0	2637	56	2.12%	No
121030273231	0	0	0	7	843	7	0.83%	No
121030273232	0	65	0	33	1999	98	4.90%	No
121030273241	0	0	0	0	797	0	0.00%	No
121030273242	7	66	0	0	1683	73	4.34%	No
121030273243	8	15	12	0	1379	35	2.54%	No
121030273251	10	30	39	0	1766	79	4.47%	No
121030273252	24	0	0	0	1894	24	1.27%	No
121030273261	80	15	0	18	1932	113	5.85%	Yes
121030273262	84	0	0	15	1569	99	6.31%	Yes
121030273271	33	20	7	0	1911	60	3.14%	No
121030273272	94	44	30	0	2610	168	6.44%	Yes
121030274011	51	35	0	0	1671	86	5.15%	Yes
121030274012	13	9	0	0	975	22	2.26%	No
121030274021	0	0	0	0	556	0	0.00%	No
121030274022	0	0	0	0	475	0	0.00%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030274023	13	36	0	133	1704	182	10.68%	Yes
121030274024	16	128	0	0	1136	144	12.68%	Yes
121030274025	190	0	0	0	1738	190	10.93%	Yes
121030274031	51	16	9	0	1758	76	4.32%	No
121030275011	20	48	0	0	2576	68	2.64%	No
121030275012	2	6	0	0	678	8	1.18%	No
121030275013	0	0	0	0	462	0	0.00%	No
121030275014	0	70	0	0	1836	70	3.81%	No
121030275021	0	0	8	0	1932	8	0.41%	No
121030275022	30	19	18	0	3018	67	2.22%	No
121030275023	40	108	0	0	2521	148	5.87%	Yes
121030276031	30	0	0	0	1523	30	1.97%	No
121030276032	16	0	0	0	570	16	2.81%	No
121030276033	0	0	0	0	228	0	0.00%	No
121030276041	0	25	9	0	1469	34	2.31%	No
121030276042	9	23	0	0	553	32	5.79%	Yes
121030276051	51	49	2	0	1603	102	6.36%	Yes
121030276061	0	0	0	0	648	0	0.00%	No
121030276062	0	4	0	0	1165	4	0.34%	No
121030277011	18	37	9	0	1984	64	3.23%	No
121030277012	0	22	0	0	628	22	3.50%	No
121030277031	0	4	0	0	541	4	0.74%	No
121030277032	6	8	0	0	540	14	2.59%	No
121030277041	0	0	0	0	202	0	0.00%	No
121030277042	0	14	3	0	822	17	2.07%	No
121030277043	0	5	5	0	577	10	1.73%	No
121030277044	5	5	0	0	922	10	1.08%	No
121030278011	0	0	0	0	630	0	0.00%	No
121030278012	0	0	18	14	931	32	3.44%	No
121030278021	48	0	0	0	907	48	5.29%	Yes
121030278022	21	61	0	0	1711	82	4.79%	No
121030279011	10	0	0	0	342	10	2.92%	No
121030279012	0	33	0	0	808	33	4.08%	No
121030279013	0	22	29	0	921	51	5.54%	Yes
121030279031	31	44	16	0	1484	91	6.13%	Yes
121030279041	0	9	13	0	1082	22	2.03%	No
121030279042	10	47	0	0	1160	57	4.91%	No
121030279043	24	7	0	0	752	31	4.12%	No

Block Group ID	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian Pacific Population	Total LEP All Other Population	Total Population (>5 years old)	Total LEP Population (>5 years old)	Percent LEP Population	LEP Block Group
121030280021	12	0	0	0	1458	12	0.82%	No
121030280022	0	0	0	0	804	0	0.00%	No
121030280023	0	0	0	0	534	0	0.00%	No
121030280024	10	0	9	0	1241	19	1.53%	No
121030280031	0	28	0	10	951	38	4.00%	No
121030280032	0	28	10	0	951	38	4.00%	No
121030280033	10	0	0	0	514	10	1.95%	No
121030280034	0	38	0	0	836	38	4.55%	No
121030280041	0	11	0	0	953	11	1.15%	No
121030280042	0	8	0	23	1017	31	3.05%	No
121030281021	19	0	0	0	637	19	2.98%	No
121030281022	0	0	0	0	831	0	0.00%	No
121030281023	7	8	11	0	1638	26	1.59%	No
121030281031	0	0	4	0	497	4	0.80%	No
121030281032	27	0	0	0	1118	27	2.42%	No
121030281041	8	0	0	0	512	8	1.56%	No
121030281042	56	4	0	0	1494	60	4.02%	No
121030281043	0	15	0	0	580	15	2.59%	No
121030281044	0	0	0	0	765	0	0.00%	No
121030282001	0	0	0	0	942	0	0.00%	No
121030282002	0	0	7	0	482	7	1.45%	No
121030282003	0	24	0	0	949	24	2.53%	No
121030283001	141	0	0	0	971	141	14.52%	Yes
121030283002	0	0	0	0	959	0	0.00%	No
121030283003	0	0	0	0	727	0	0.00%	No
121030283004	0	0	21	0	727	21	2.89%	No
121030284011	0	29	0	0	533	29	5.44%	Yes
121030284012	0	38	0	0	1043	38	3.64%	No
121030284021	0	0	0	0	602	0	0.00%	No
121030284022	0	5	0	0	674	5	0.74%	No
121030285001	0	8	0	0	1151	8	0.70%	No
121030285002	0	17	0	0	851	17	2.00%	No
121030286001	8	8	0	0	1228	16	1.30%	No
121030286002	7	17	0	0	1301	24	1.84%	No
121030286003	0	0	0	0	1589	0	0.00%	No
121030287001	0	69	30	0	1483	99	6.68%	Yes
121030287002	0	0	0	0	1148	0	0.00%	No

APPENDIX D: Detailed Census Block Group - Demographic Details

Table D-1: Pinellas County Minority & Low-Income Population Details by Census Block Group (2014-2018 5-Year ACS)

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030201011	1185	89.7%	425	32.1%	1321	Yes	Yes
121030201012	637	64.0%	423	42.5%	995	Yes	Yes
121030201013	1637	82.8%	227	11.5%	1977	Yes	No
121030201014	523	79.2%	27	4.1%	660	Yes	No
121030201051	504	26.9%	116	6.2%	1873	Yes	No
121030201052	363	20.5%	131	7.4%	1768	No	No
121030201053	669	43.2%	164	10.6%	1550	Yes	No
121030201061	25	4.7%	9	1.7%	537	No	No
121030201062	91	6.2%	79	5.4%	1475	No	No
121030201063	101	9.5%	32	3.0%	1058	No	No
121030201064	60	12.3%	0	0.0%	487	No	No
121030201071	58	6.9%	24	2.9%	836	No	No
121030201072	36	4.3%	16	1.9%	838	No	No
121030201081	44	6.3%	22	3.2%	693	No	No
121030201082	10	2.1%	98	20.5%	478	No	Yes
121030201083	68	6.3%	112	10.3%	1086	No	No
121030202011	1406	61.4%	247	10.8%	2289	Yes	No
121030202012	1669	77.3%	400	18.5%	2160	Yes	Yes
121030202013	583	69.0%	31	3.7%	845	Yes	No
121030202021	145	22.2%	15	2.3%	653	No	No
121030202022	1088	81.0%	262	19.5%	1344	Yes	Yes
121030202023	502	36.6%	93	6.8%	1372	Yes	No
121030202061	1758	64.8%	254	9.4%	2713	Yes	No
121030202062	1285	73.2%	365	20.8%	1756	Yes	Yes
121030202071	658	31.1%	241	11.4%	2118	Yes	No
121030202072	627	83.8%	25	3.3%	748	Yes	No
121030202081	1128	80.6%	354	25.3%	1399	Yes	Yes
121030202082	845	81.9%	141	13.7%	1032	Yes	Yes
121030202091	477	42.0%	67	5.9%	1136	Yes	No
121030202092	540	34.9%	242	15.7%	1546	Yes	Yes
121030202093	536	81.5%	46	6.9%	658	Yes	No
121030202094	988	94.4%	63	6.0%	1047	Yes	No
121030203011	719	71.8%	590	58.9%	1001	Yes	Yes
121030203012	484	54.8%	0	0.0%	884	Yes	No
121030203013	548	66.9%	136	16.6%	819	Yes	Yes
121030203014	375	62.8%	100	16.8%	597	Yes	Yes
121030203021	304	32.8%	64	6.9%	927	Yes	No
121030203022	1186	63.6%	268	14.4%	1866	Yes	Yes
121030203023	763	59.4%	355	27.6%	1285	Yes	Yes

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030204001	308	42.0%	56	7.6%	734	Yes	No
121030204002	253	31.8%	45	5.7%	796	Yes	No
121030204003	438	49.8%	164	18.7%	879	Yes	Yes
121030205001	322	79.7%	126	31.2%	404	Yes	Yes
121030205002	1162	86.1%	550	40.8%	1349	Yes	Yes
121030205003	610	76.7%	501	63.0%	795	Yes	Yes
121030205004	1472	96.3%	690	45.2%	1528	Yes	Yes
121030206001	1071	92.9%	314	27.2%	1153	Yes	Yes
121030206002	813	73.8%	415	37.7%	1102	Yes	Yes
121030206003	1151	91.1%	159	12.6%	1264	Yes	No
121030206004	555	98.9%	183	32.6%	561	Yes	Yes
121030207001	281	94.3%	110	36.9%	298	Yes	Yes
121030207002	996	98.8%	65	6.4%	1008	Yes	No
121030207003	685	97.4%	43	6.1%	703	Yes	No
121030207004	1217	100.0%	355	29.2%	1217	Yes	Yes
121030208001	822	97.2%	377	44.6%	846	Yes	Yes
121030208002	492	81.9%	43	7.1%	601	Yes	No
121030208003	1249	89.4%	590	42.2%	1397	Yes	Yes
121030208004	900	95.4%	587	62.2%	943	Yes	Yes
121030208005	741	97.0%	259	33.9%	764	Yes	Yes
121030208006	1167	100.0%	450	38.6%	1167	Yes	Yes
121030212001	447	98.5%	105	23.1%	454	Yes	Yes
121030212002	546	100.0%	321	58.8%	546	Yes	Yes
121030212003	1041	82.1%	672	53.0%	1268	Yes	Yes
121030212004	716	70.1%	772	75.6%	1021	Yes	Yes
121030215001	300	25.4%	324	27.4%	1183	No	Yes
121030215002	139	37.6%	73	19.7%	370	Yes	Yes
121030215003	157	8.8%	170	9.5%	1783	No	No
121030216001	256	44.1%	115	19.8%	581	Yes	Yes
121030216002	359	53.5%	357	53.2%	671	Yes	Yes
121030216003	659	54.8%	648	53.9%	1202	Yes	Yes
121030218001	260	37.0%	282	40.1%	703	Yes	Yes
121030218002	556	58.1%	350	36.6%	957	Yes	Yes
121030218003	16	7.9%	33	16.3%	202	No	Yes
121030218004	812	67.2%	89	7.4%	1209	Yes	No
121030219001	179	27.1%	313	47.4%	660	Yes	Yes
121030219002	168	26.2%	33	5.1%	642	Yes	No
121030219003	37	6.5%	51	9.0%	565	No	No
121030219004	90	33.3%	8	3.0%	270	Yes	No
121030219005	502	67.1%	161	21.5%	748	Yes	Yes

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030220001	559	64.8%	95	11.0%	863	Yes	No
121030220002	382	84.9%	150	33.3%	450	Yes	Yes
121030220003	547	71.1%	208	27.0%	769	Yes	Yes
121030220004	849	80.1%	261	24.7%	1060	Yes	Yes
121030221001	172	19.1%	188	20.8%	902	No	Yes
121030221002	242	29.9%	109	13.5%	809	Yes	Yes
121030221003	626	68.5%	71	7.8%	914	Yes	No
121030221004	436	41.3%	65	6.2%	1056	Yes	No
121030221005	238	19.5%	49	4.0%	1222	No	No
121030222001	189	17.8%	235	22.2%	1059	No	Yes
121030222002	469	37.4%	149	11.9%	1255	Yes	No
121030222003	1015	70.1%	255	17.6%	1448	Yes	Yes
121030222004	451	59.3%	0	0.0%	760	Yes	No
121030223011	138	11.9%	29	2.5%	1158	No	No
121030223012	386	28.7%	99	7.4%	1345	Yes	No
121030223013	151	25.3%	70	11.8%	596	No	No
121030223021	182	16.4%	128	11.5%	1111	No	No
121030223022	87	8.1%	8	0.7%	1068	No	No
121030223023	213	12.7%	211	12.6%	1671	No	No
121030224011	294	31.1%	73	7.7%	945	Yes	No
121030224012	54	4.0%	43	3.2%	1356	No	No
121030224013	128	19.6%	146	22.4%	652	No	Yes
121030224014	44	6.5%	87	12.8%	679	No	No
121030224021	47	11.6%	89	22.0%	404	No	Yes
121030224022	332	21.4%	150	9.7%	1553	No	No
121030224023	0	0.0%	12	3.0%	394	No	No
121030224024	109	16.7%	85	13.0%	652	No	Yes
121030224025	0	0.0%	280	29.5%	950	No	Yes
121030224026	0	0.0%	0	0.0%	620	No	No
121030225011	1110	48.6%	181	7.9%	2282	Yes	No
121030225012	112	13.0%	32	3.7%	863	No	No
121030225013	547	26.7%	263	12.8%	2052	Yes	No
121030225021	621	50.5%	99	8.1%	1229	Yes	No
121030225022	238	30.1%	126	15.9%	791	Yes	Yes
121030225023	298	16.0%	151	8.1%	1865	No	No
121030225031	388	19.5%	135	6.8%	1991	No	No
121030225032	385	25.5%	51	3.4%	1510	No	No
121030225033	653	33.4%	90	4.6%	1955	Yes	No
121030226011	160	12.1%	90	6.8%	1322	No	No
121030226012	326	29.8%	135	12.3%	1094	Yes	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030226013	608	45.7%	164	12.3%	1330	Yes	No
121030226021	304	16.4%	360	19.4%	1852	No	Yes
121030226022	221	19.2%	84	7.3%	1153	No	No
121030226023	443	26.2%	89	5.3%	1688	Yes	No
121030227001	740	40.4%	176	9.6%	1833	Yes	No
121030227002	196	11.8%	201	12.1%	1665	No	No
121030227003	147	21.1%	75	10.8%	696	No	No
121030228011	1001	42.8%	813	34.8%	2339	Yes	Yes
121030228012	352	27.1%	117	9.0%	1301	Yes	No
121030228013	534	38.6%	308	22.3%	1382	Yes	Yes
121030228021	426	37.4%	10	0.9%	1138	Yes	No
121030228022	517	40.5%	27	2.1%	1276	Yes	No
121030228023	395	29.3%	117	8.7%	1349	Yes	No
121030229011	730	31.5%	181	7.8%	2315	Yes	No
121030229012	265	36.7%	82	11.4%	722	Yes	No
121030229021	431	38.3%	167	14.8%	1125	Yes	Yes
121030229022	187	27.2%	159	23.1%	687	Yes	Yes
121030229023	547	49.4%	153	13.8%	1108	Yes	Yes
121030230001	556	43.6%	220	17.3%	1275	Yes	Yes
121030230002	228	18.5%	179	14.5%	1232	No	Yes
121030231001	440	35.8%	104	8.5%	1230	Yes	No
121030231002	516	42.4%	298	24.5%	1218	Yes	Yes
121030232001	214	22.1%	129	13.4%	967	No	Yes
121030232002	105	10.2%	89	8.7%	1028	No	No
121030232003	42	5.2%	37	4.6%	807	No	No
121030233001	182	15.9%	194	17.0%	1142	No	Yes
121030233002	87	16.3%	80	15.0%	535	No	Yes
121030233003	153	20.2%	125	16.5%	757	No	Yes
121030234001	121	17.5%	121	17.5%	690	No	Yes
121030234002	351	35.7%	308	31.3%	984	Yes	Yes
121030235001	138	14.6%	164	17.4%	944	No	Yes
121030235002	200	22.8%	124	14.1%	877	No	Yes
121030235003	474	31.2%	354	23.3%	1521	Yes	Yes
121030236001	91	16.6%	16	2.9%	548	No	No
121030236002	261	20.7%	119	9.5%	1259	No	No
121030236003	61	4.5%	209	15.6%	1343	No	Yes
121030237001	103	9.7%	46	4.3%	1065	No	No
121030237002	102	15.9%	74	11.6%	641	No	No
121030237003	185	19.0%	21	2.2%	975	No	No
121030238001	21	1.9%	24	2.1%	1127	No	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030238002	110	8.2%	131	9.7%	1346	No	No
121030239001	172	21.1%	89	10.9%	817	No	No
121030239002	124	9.8%	37	2.9%	1269	No	No
121030240011	78	5.3%	110	7.5%	1473	No	No
121030240012	165	9.8%	60	3.6%	1676	No	No
121030240021	30	1.7%	16	0.9%	1766	No	No
121030240022	607	37.5%	99	6.1%	1617	Yes	No
121030240023	185	7.7%	150	6.2%	2410	No	No
121030240041	855	30.9%	58	2.1%	2766	Yes	No
121030240042	112	6.6%	53	3.1%	1698	No	No
121030240043	35	3.5%	0	0.0%	1013	No	No
121030240051	226	13.2%	44	2.6%	1715	No	No
121030240052	102	7.3%	76	5.4%	1400	No	No
121030241001	152	25.1%	0	0.0%	606	No	No
121030241002	103	6.9%	55	3.7%	1488	No	No
121030241003	169	16.0%	203	19.2%	1058	No	Yes
121030241004	269	19.5%	381	27.7%	1377	No	Yes
121030242001	314	24.9%	271	21.5%	1263	No	Yes
121030242002	100	7.2%	209	15.0%	1396	No	Yes
121030242003	91	17.3%	65	12.3%	527	No	No
121030242004	344	34.9%	173	17.5%	987	Yes	Yes
121030242005	141	15.9%	158	17.8%	889	No	Yes
121030243011	422	26.2%	239	14.8%	1611	Yes	Yes
121030243012	191	17.4%	93	8.5%	1097	No	No
121030243013	213	19.8%	95	8.8%	1077	No	No
121030243014	259	37.3%	0	0.0%	695	Yes	No
121030243021	410	37.7%	223	20.5%	1088	Yes	Yes
121030243022	281	12.7%	113	5.1%	2204	No	No
121030243023	314	28.7%	125	11.4%	1093	Yes	No
121030244031	349	32.2%	66	6.1%	1084	Yes	No
121030244032	530	26.6%	619	31.1%	1991	Yes	Yes
121030244033	426	33.2%	115	9.0%	1283	Yes	No
121030244061	1416	67.6%	508	24.2%	2096	Yes	Yes
121030244062	281	15.7%	316	17.6%	1791	No	Yes
121030244063	931	53.4%	104	6.0%	1744	Yes	No
121030244081	532	30.8%	241	13.9%	1728	Yes	Yes
121030244082	510	33.5%	300	19.7%	1522	Yes	Yes
121030244083	194	20.7%	113	12.0%	935	No	No
121030244091	229	13.6%	159	9.4%	1686	No	No
121030244092	18	1.4%	9	0.7%	1254	No	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030244101	610	30.9%	314	15.9%	1977	Yes	Yes
121030244102	468	29.8%	151	9.6%	1569	Yes	No
121030244111	76	25.0%	19	6.3%	304	No	No
121030244112	479	23.2%	399	19.3%	2069	No	Yes
121030244113	61	7.2%	0	0.0%	842	No	No
121030244114	148	18.3%	68	8.4%	807	No	No
121030244121	857	24.1%	309	8.7%	3560	No	No
121030244122	355	48.0%	128	17.3%	739	Yes	Yes
121030244131	498	32.8%	97	6.4%	1517	Yes	No
121030244132	59	9.0%	19	2.9%	654	No	No
121030244133	447	19.6%	137	6.0%	2279	No	No
121030244134	90	12.7%	21	3.0%	708	No	No
121030245051	28	3.1%	115	12.8%	898	No	No
121030245052	921	33.9%	128	4.7%	2719	Yes	No
121030245053	153	13.7%	185	16.6%	1114	No	Yes
121030245054	662	29.3%	139	6.2%	2256	Yes	No
121030245071	423	18.6%	222	9.8%	2273	No	No
121030245072	384	25.8%	127	8.5%	1487	Yes	No
121030245081	1160	34.3%	397	11.7%	3382	Yes	No
121030245082	785	41.9%	408	21.8%	1872	Yes	Yes
121030245091	124	13.2%	106	11.3%	939	No	No
121030245092	396	30.2%	24	1.8%	1311	Yes	No
121030245093	287	20.6%	101	7.2%	1396	No	No
121030245101	487	55.6%	109	12.4%	876	Yes	No
121030245102	1641	76.6%	482	22.5%	2141	Yes	Yes
121030245103	1177	48.1%	2041	83.3%	2449	Yes	Yes
121030245111	852	34.5%	304	12.3%	2473	Yes	No
121030245112	180	42.4%	24	5.6%	425	Yes	No
121030245113	2057	32.5%	844	13.3%	6324	Yes	Yes
121030245121	118	12.4%	89	9.3%	954	No	No
121030245122	530	22.8%	478	20.6%	2324	No	Yes
121030245131	47	4.9%	63	6.5%	966	No	No
121030245132	61	11.5%	119	22.4%	531	No	Yes
121030245133	668	28.4%	213	9.1%	2348	Yes	No
121030245141	634	60.1%	256	24.3%	1055	Yes	Yes
121030245142	1104	50.5%	606	27.7%	2187	Yes	Yes
121030245143	733	42.9%	498	29.1%	1709	Yes	Yes
121030246011	228	12.7%	372	20.7%	1795	No	Yes
121030246012	102	9.8%	155	14.9%	1041	No	Yes
121030246013	265	25.6%	238	23.0%	1036	No	Yes

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030246021	867	73.5%	494	41.9%	1179	Yes	Yes
121030246022	735	45.0%	1062	65.0%	1635	Yes	Yes
121030246023	715	33.2%	459	21.3%	2156	Yes	Yes
121030246024	136	16.5%	103	12.5%	826	No	No
121030247011	391	30.8%	381	30.0%	1268	Yes	Yes
121030247012	255	33.5%	68	9.0%	761	Yes	No
121030247013	511	34.2%	758	50.7%	1494	Yes	Yes
121030247021	125	33.7%	56	15.1%	371	Yes	Yes
121030247022	197	22.7%	112	12.9%	868	No	No
121030247023	332	36.2%	409	44.7%	916	Yes	Yes
121030247031	590	39.7%	179	12.0%	1486	Yes	No
121030247032	771	65.2%	138	11.6%	1182	Yes	No
121030247033	161	29.8%	202	37.3%	541	Yes	Yes
121030248011	460	21.4%	241	11.2%	2146	No	No
121030248012	340	16.3%	324	15.6%	2082	No	Yes
121030248031	119	16.0%	221	29.6%	746	No	Yes
121030248032	852	47.6%	227	12.7%	1790	Yes	No
121030248041	849	39.1%	542	24.9%	2174	Yes	Yes
121030248051	735	48.0%	65	4.2%	1530	Yes	No
121030248052	408	33.4%	65	5.3%	1220	Yes	No
121030249011	382	32.0%	209	17.5%	1194	Yes	Yes
121030249012	482	21.4%	454	20.1%	2254	No	Yes
121030249013	610	27.0%	223	9.9%	2261	Yes	No
121030249021	352	20.9%	476	28.2%	1685	No	Yes
121030249022	319	29.2%	276	25.3%	1093	Yes	Yes
121030249023	865	35.1%	447	18.2%	2462	Yes	Yes
121030249024	883	48.4%	446	24.5%	1823	Yes	Yes
121030249041	531	23.1%	107	4.7%	2300	No	No
121030249042	440	35.3%	202	16.2%	1248	Yes	Yes
121030249051	607	22.2%	594	21.7%	2736	No	Yes
121030249052	1082	35.0%	222	7.2%	3091	Yes	No
121030249053	293	28.0%	44	4.2%	1046	Yes	No
121030249061	604	26.3%	427	18.6%	2295	Yes	Yes
121030249062	437	42.7%	123	12.0%	1023	Yes	No
121030249063	131	21.9%	181	30.2%	598	No	Yes
121030250041	351	20.7%	191	11.3%	1694	No	No
121030250042	470	29.2%	369	22.9%	1611	Yes	Yes
121030250043	555	26.1%	420	19.7%	2127	Yes	Yes
121030250044	673	74.9%	310	34.5%	899	Yes	Yes
121030250071	210	22.9%	94	10.3%	917	No	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030250072	311	15.0%	234	11.3%	2073	No	No
121030250073	92	8.5%	109	10.0%	1086	No	No
121030250091	428	19.2%	228	10.2%	2226	No	No
121030250092	731	36.5%	321	16.0%	2002	Yes	Yes
121030250101	306	24.1%	32	2.5%	1272	No	No
121030250102	49	5.7%	0	0.0%	866	No	No
121030250103	188	18.3%	30	2.9%	1025	No	No
121030250104	331	18.4%	79	4.4%	1801	No	No
121030250111	638	25.0%	236	9.2%	2551	No	No
121030250112	412	29.4%	84	6.0%	1399	Yes	No
121030250113	31	2.2%	41	2.9%	1437	No	No
121030250121	0	0.0%	140	9.8%	1423	No	No
121030250122	302	19.0%	42	2.6%	1591	No	No
121030250123	506	20.9%	184	7.6%	2416	No	No
121030250131	304	16.9%	209	11.6%	1797	No	No
121030250132	17	1.7%	116	11.7%	990	No	No
121030250133	252	19.4%	203	15.7%	1297	No	Yes
121030250141	376	16.7%	155	6.9%	2249	No	No
121030250142	369	58.2%	57	9.0%	634	Yes	No
121030250143	274	15.4%	129	7.3%	1775	No	No
121030250151	89	6.9%	93	7.3%	1282	No	No
121030250152	81	5.4%	209	13.8%	1513	No	Yes
121030250161	574	26.2%	220	10.1%	2187	Yes	No
121030250171	238	16.9%	155	11.0%	1411	No	No
121030250172	82	7.3%	126	11.2%	1129	No	No
121030250181	293	47.1%	153	24.7%	622	Yes	Yes
121030250182	114	16.4%	140	20.1%	696	No	Yes
121030250183	239	26.8%	147	16.5%	891	Yes	Yes
121030250191	0	0.0%	75	14.2%	529	No	Yes
121030250192	335	19.0%	459	26.0%	1766	No	Yes
121030251061	113	12.7%	113	12.8%	889	No	No
121030251062	122	8.4%	89	6.1%	1455	No	No
121030251071	78	9.9%	78	9.9%	784	No	No
121030251072	340	21.7%	102	6.5%	1565	No	No
121030251073	111	6.7%	331	20.0%	1654	No	Yes
121030251081	47	4.5%	49	4.7%	1042	No	No
121030251082	221	19.6%	182	16.1%	1129	No	Yes
121030251091	242	22.6%	140	13.1%	1072	No	Yes
121030251092	349	19.2%	339	18.7%	1815	No	Yes
121030251093	152	10.7%	129	9.1%	1425	No	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030251101	122	9.2%	111	8.4%	1323	No	No
121030251102	159	17.2%	257	27.8%	923	No	Yes
121030251103	96	8.1%	56	4.7%	1192	No	No
121030251104	44	2.8%	53	3.4%	1564	No	No
121030251111	66	5.4%	262	21.4%	1227	No	Yes
121030251112	17	3.3%	90	17.2%	521	No	Yes
121030251113	159	12.3%	59	4.6%	1289	No	No
121030251121	299	31.7%	89	9.4%	942	Yes	No
121030251122	193	15.5%	92	7.4%	1244	No	No
121030251123	110	9.0%	35	2.9%	1217	No	No
121030251131	99	10.6%	85	9.0%	936	No	No
121030251132	113	17.9%	189	30.0%	630	No	Yes
121030251133	137	12.2%	79	7.1%	1119	No	No
121030251141	161	8.4%	353	18.5%	1912	No	Yes
121030251142	39	3.0%	126	9.6%	1316	No	No
121030251151	164	8.3%	216	11.0%	1966	No	No
121030251152	230	17.9%	335	26.0%	1288	No	Yes
121030251161	52	7.4%	152	21.7%	699	No	Yes
121030251162	328	23.4%	97	6.9%	1399	No	No
121030251191	266	10.8%	138	5.6%	2473	No	No
121030251192	39	3.7%	100	9.5%	1055	No	No
121030251193	207	10.5%	149	7.5%	1980	No	No
121030251201	114	8.9%	8	0.6%	1281	No	No
121030251202	74	9.6%	18	2.3%	771	No	No
121030251203	110	7.2%	105	6.9%	1528	No	No
121030251211	223	9.2%	25	1.0%	2423	No	No
121030251212	207	9.5%	22	1.0%	2178	No	No
121030251221	270	13.8%	22	1.1%	1955	No	No
121030251222	153	8.1%	105	5.6%	1890	No	No
121030251223	274	15.3%	83	4.6%	1787	No	No
121030251231	87	7.8%	52	4.7%	1110	No	No
121030251232	60	8.1%	33	4.5%	739	No	No
121030252031	128	5.2%	393	16.0%	2457	No	Yes
121030252032	47	4.2%	25	2.2%	1113	No	No
121030252033	219	10.2%	143	6.7%	2151	No	No
121030252041	396	17.3%	310	13.6%	2283	No	Yes
121030252042	99	8.7%	128	11.3%	1136	No	No
121030252051	54	4.9%	68	6.1%	1113	No	No
121030252052	156	8.8%	100	5.6%	1777	No	No
121030252053	65	6.1%	45	4.2%	1068	No	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030252071	495	22.8%	565	26.0%	2174	No	Yes
121030252072	1555	39.8%	1154	29.6%	3903	Yes	Yes
121030252073	40	3.0%	63	4.7%	1352	No	No
121030252081	81	13.1%	89	14.4%	619	No	Yes
121030252082	36	3.4%	153	14.6%	1046	No	Yes
121030252091	561	19.3%	466	16.1%	2903	No	Yes
121030252092	90	7.1%	139	10.9%	1275	No	No
121030252093	66	12.2%	46	8.5%	540	No	No
121030253031	328	21.9%	334	22.3%	1497	No	Yes
121030253032	381	16.9%	277	12.3%	2261	No	No
121030253033	82	5.0%	189	11.6%	1628	No	No
121030253041	14	1.2%	161	14.1%	1140	No	Yes
121030253042	88	11.2%	75	9.5%	786	No	No
121030253043	96	8.1%	96	8.1%	1185	No	No
121030253051	34	2.5%	190	14.2%	1342	No	Yes
121030253052	823	52.9%	172	11.1%	1555	Yes	No
121030253061	181	12.3%	207	14.1%	1473	No	Yes
121030253071	209	12.7%	234	14.3%	1642	No	Yes
121030253072	1449	64.0%	307	13.6%	2263	Yes	Yes
121030253073	44	5.8%	29	3.8%	757	No	No
121030253081	140	18.1%	111	14.3%	774	No	Yes
121030253082	119	7.9%	188	12.5%	1499	No	No
121030254011	184	12.0%	78	5.1%	1527	No	No
121030254012	223	21.1%	239	22.6%	1056	No	Yes
121030254013	164	12.1%	51	3.8%	1350	No	No
121030254014	217	25.5%	16	1.9%	851	No	No
121030254051	114	21.4%	25	4.7%	532	No	No
121030254052	53	3.8%	334	23.9%	1397	No	Yes
121030254053	473	21.9%	472	21.9%	2155	No	Yes
121030254071	352	19.9%	67	3.8%	1767	No	No
121030254072	725	35.3%	569	27.7%	2053	Yes	Yes
121030254073	273	15.3%	138	7.7%	1784	No	No
121030254081	630	39.4%	69	4.3%	1600	Yes	No
121030254082	69	6.1%	0	0.0%	1127	No	No
121030254083	880	27.2%	423	13.1%	3238	Yes	Yes
121030254111	807	38.3%	389	18.5%	2106	Yes	Yes
121030254121	659	43.8%	17	1.1%	1506	Yes	No
121030254122	437	28.3%	177	11.5%	1545	Yes	No
121030254123	10	1.5%	96	14.3%	673	No	Yes
121030254124	121	9.5%	176	13.8%	1280	No	Yes

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030254131	110	11.6%	51	5.4%	952	No	No
121030254132	160	20.5%	255	32.7%	779	No	Yes
121030254133	216	17.4%	52	4.2%	1239	No	No
121030254141	85	12.0%	104	14.6%	711	No	Yes
121030254142	433	24.4%	80	4.5%	1778	No	No
121030254151	192	16.0%	102	8.5%	1201	No	No
121030254152	1208	35.9%	295	8.8%	3366	Yes	No
121030254161	524	32.4%	196	12.1%	1619	Yes	No
121030254162	412	22.2%	181	9.8%	1856	No	No
121030254171	35	4.1%	76	8.9%	854	No	No
121030254172	50	3.1%	278	17.3%	1604	No	Yes
121030255011	340	23.2%	282	19.2%	1466	No	Yes
121030255012	227	11.3%	157	7.8%	2011	No	No
121030255013	150	18.3%	0	0.0%	818	No	No
121030255031	155	7.3%	499	23.5%	2127	No	Yes
121030255032	96	7.7%	31	2.5%	1253	No	No
121030255033	347	20.3%	425	24.9%	1707	No	Yes
121030255051	1401	50.4%	825	29.7%	2781	Yes	Yes
121030255061	156	13.8%	104	9.2%	1129	No	No
121030255062	546	28.0%	293	15.0%	1949	Yes	Yes
121030255063	118	14.6%	35	4.3%	810	No	No
121030255064	514	24.1%	379	17.8%	2135	No	Yes
121030256021	351	30.5%	453	39.4%	1150	Yes	Yes
121030256022	376	28.2%	112	8.4%	1332	Yes	No
121030256023	101	16.7%	67	11.1%	605	No	No
121030256031	189	29.2%	157	24.3%	647	Yes	Yes
121030256032	203	41.0%	84	17.0%	495	Yes	Yes
121030256033	224	17.0%	116	8.8%	1317	No	No
121030256041	270	19.7%	265	19.3%	1370	No	Yes
121030257001	76	10.1%	18	2.4%	752	No	No
121030257002	104	10.2%	71	7.0%	1016	No	No
121030257003	187	12.0%	19	1.2%	1553	No	No
121030257004	115	14.8%	9	1.2%	776	No	No
121030258001	384	29.0%	193	14.6%	1325	Yes	Yes
121030258002	1180	71.3%	554	33.5%	1656	Yes	Yes
121030258003	1156	70.6%	950	58.0%	1638	Yes	Yes
121030259001	669	45.5%	603	41.0%	1470	Yes	Yes
121030259002	0	0.0%	21	3.5%	592	No	No
121030259003	180	34.3%	78	14.9%	525	Yes	Yes
121030259004	816	59.2%	611	44.3%	1379	Yes	Yes

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030259005	224	53.5%	167	39.9%	419	Yes	Yes
121030259006	24	3.5%	58	8.4%	690	No	No
121030260011	44	3.9%	36	3.2%	1114	No	No
121030260012	34	3.3%	181	17.4%	1039	No	Yes
121030260013	40	5.3%	105	14.0%	751	No	Yes
121030260021	84	7.5%	83	7.4%	1127	No	No
121030260022	65	11.4%	99	17.3%	572	No	Yes
121030260023	123	11.5%	171	16.0%	1068	No	Yes
121030261011	211	20.4%	261	25.3%	1033	No	Yes
121030261012	210	46.7%	241	53.6%	450	Yes	Yes
121030261013	491	60.8%	60	7.4%	807	Yes	No
121030261021	101	12.7%	29	3.6%	795	No	No
121030261022	196	38.4%	80	15.7%	511	Yes	Yes
121030262001	984	87.4%	414	36.7%	1126	Yes	Yes
121030262002	842	89.4%	316	33.5%	942	Yes	Yes
121030263001	443	36.0%	450	36.6%	1229	Yes	Yes
121030263002	1789	76.1%	992	42.2%	2350	Yes	Yes
121030263003	525	58.1%	378	41.8%	904	Yes	Yes
121030263004	1436	79.1%	551	30.4%	1815	Yes	Yes
121030263005	570	54.1%	89	8.5%	1053	Yes	No
121030263006	343	57.9%	125	21.1%	592	Yes	Yes
121030264001	761	73.7%	372	36.0%	1032	Yes	Yes
121030264002	1856	81.8%	494	21.8%	2269	Yes	Yes
121030264003	347	26.4%	400	30.4%	1315	Yes	Yes
121030264004	159	15.9%	9	0.9%	999	No	No
121030264005	475	43.5%	57	5.2%	1092	Yes	No
121030265001	429	62.4%	249	36.2%	688	Yes	Yes
121030265002	707	36.5%	129	6.7%	1939	Yes	No
121030265003	815	50.7%	328	20.4%	1608	Yes	Yes
121030265004	76	15.4%	95	19.3%	492	No	Yes
121030265005	186	41.5%	50	11.1%	448	Yes	No
121030265006	562	26.6%	292	13.8%	2114	Yes	Yes
121030266011	72	10.9%	38	5.8%	659	No	No
121030266012	272	42.4%	115	17.9%	641	Yes	Yes
121030266013	108	9.7%	0	0.0%	1108	No	No
121030266014	249	25.6%	90	9.2%	974	No	No
121030266021	417	39.6%	119	11.3%	1053	Yes	No
121030266022	281	23.0%	303	24.8%	1223	No	Yes
121030267011	970	52.3%	116	6.3%	1855	Yes	No
121030267012	344	33.4%	91	8.9%	1029	Yes	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030267013	246	29.6%	80	9.6%	830	Yes	No
121030267014	395	36.9%	165	15.4%	1071	Yes	Yes
121030267021	709	57.3%	65	5.3%	1237	Yes	No
121030267022	701	34.3%	568	27.8%	2041	Yes	Yes
121030267023	162	20.1%	53	6.6%	804	No	No
121030267024	31	5.7%	0	0.0%	547	No	No
121030267025	263	23.5%	14	1.3%	1118	No	No
121030267026	640	61.4%	13	1.2%	1043	Yes	No
121030267031	67	6.8%	177	18.0%	984	No	Yes
121030267032	288	22.8%	436	34.5%	1263	No	Yes
121030267033	733	49.6%	268	18.1%	1478	Yes	Yes
121030267034	308	27.0%	193	16.9%	1140	Yes	Yes
121030267035	1497	68.6%	371	17.0%	2183	Yes	Yes
121030268041	526	19.0%	36	1.3%	2768	No	No
121030268042	450	31.4%	169	11.8%	1433	Yes	No
121030268043	232	17.4%	151	11.3%	1337	No	No
121030268091	147	13.8%	123	11.5%	1068	No	No
121030268092	179	10.0%	240	13.5%	1784	No	Yes
121030268111	200	28.6%	0	0.0%	699	Yes	No
121030268112	242	11.0%	93	4.2%	2207	No	No
121030268113	282	14.0%	105	5.2%	2008	No	No
121030268114	342	26.8%	38	3.0%	1277	Yes	No
121030268121	287	10.4%	294	10.6%	2767	No	No
121030268122	389	19.1%	48	2.4%	2034	No	No
121030268131	564	25.1%	142	6.3%	2249	No	No
121030268132	636	41.0%	166	10.7%	1551	Yes	No
121030268141	292	12.7%	142	6.1%	2307	No	No
121030268151	123	6.7%	126	6.8%	1843	No	No
121030268152	46	2.8%	43	2.6%	1629	No	No
121030268153	173	13.5%	47	3.7%	1285	No	No
121030268161	118	10.5%	59	5.2%	1128	No	No
121030268162	56	7.8%	119	16.7%	714	No	Yes
121030268163	108	16.0%	0	0.0%	676	No	No
121030268164	265	14.6%	125	6.9%	1815	No	No
121030268165	338	23.7%	123	8.6%	1425	No	No
121030268171	408	21.2%	87	4.5%	1921	No	No
121030268172	611	29.8%	130	6.3%	2052	Yes	No
121030268173	486	31.9%	79	5.2%	1523	Yes	No
121030268181	766	34.8%	300	13.6%	2203	Yes	Yes
121030268182	945	55.3%	256	15.0%	1710	Yes	Yes

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030268183	150	24.2%	48	7.7%	620	No	No
121030268191	110	12.1%	145	15.9%	910	No	Yes
121030268192	924	57.7%	490	30.6%	1602	Yes	Yes
121030268201	167	12.5%	154	11.5%	1334	No	No
121030268202	149	8.4%	102	5.7%	1776	No	No
121030268203	183	11.3%	94	5.8%	1621	No	No
121030268211	772	27.5%	243	8.7%	2805	Yes	No
121030269041	173	11.6%	80	5.4%	1494	No	No
121030269042	815	43.1%	419	22.1%	1893	Yes	Yes
121030269043	267	18.9%	215	15.2%	1415	No	Yes
121030269071	239	14.1%	149	8.8%	1697	No	No
121030269072	371	15.9%	54	2.3%	2330	No	No
121030269073	155	8.9%	194	11.1%	1748	No	No
121030269081	82	12.0%	20	2.9%	681	No	No
121030269082	250	21.9%	43	3.8%	1140	No	No
121030269083	82	7.7%	55	5.1%	1068	No	No
121030269084	220	18.8%	179	15.3%	1172	No	Yes
121030269091	415	28.9%	265	18.5%	1436	Yes	Yes
121030269092	196	11.2%	205	11.7%	1746	No	No
121030269093	193	12.5%	112	7.3%	1543	No	No
121030269101	18	2.5%	68	9.3%	731	No	No
121030269102	704	23.3%	150	5.0%	3020	No	No
121030269103	378	26.2%	40	2.8%	1441	Yes	No
121030269104	191	21.3%	92	10.3%	896	No	No
121030269111	180	10.3%	35	2.0%	1745	No	No
121030269112	67	8.3%	66	8.2%	805	No	No
121030269113	48	3.5%	65	4.7%	1376	No	No
121030269121	56	9.0%	211	34.1%	619	No	Yes
121030269122	107	8.7%	51	4.2%	1226	No	No
121030269123	408	23.4%	153	8.8%	1746	No	No
121030269124	318	38.0%	53	6.3%	837	Yes	No
121030269131	215	21.5%	62	6.2%	999	No	No
121030269132	106	21.0%	383	76.0%	504	No	Yes
121030269133	86	14.3%	23	3.8%	601	No	No
121030269134	151	13.9%	242	22.3%	1086	No	Yes
121030270001	246	14.1%	132	7.6%	1745	No	No
121030270002	111	13.5%	137	16.7%	822	No	Yes
121030270003	12	2.8%	43	9.9%	435	No	No
121030270004	654	30.2%	252	11.6%	2164	Yes	No
121030271011	312	16.9%	497	26.9%	1850	No	Yes

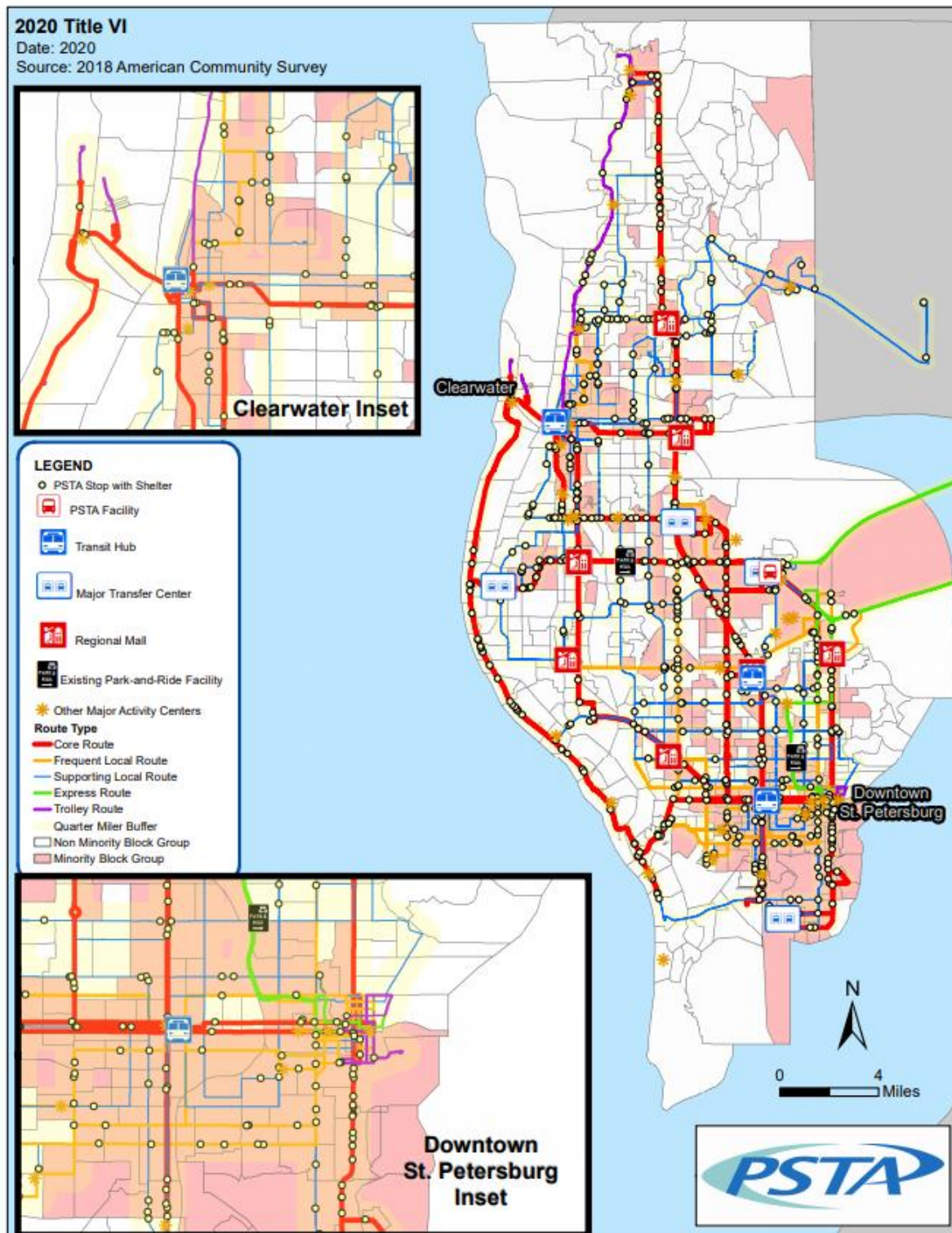
Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030271012	151	9.1%	280	16.9%	1661	No	Yes
121030271013	80	15.7%	99	19.5%	508	No	Yes
121030271051	98	6.5%	178	11.7%	1517	No	No
121030271052	164	8.7%	157	8.3%	1882	No	No
121030271061	528	24.9%	39	1.8%	2124	No	No
121030271062	31	2.6%	130	11.1%	1171	No	No
121030271063	25	2.1%	0	0.0%	1180	No	No
121030271064	18	3.6%	119	23.5%	507	No	Yes
121030272021	13	1.5%	54	6.2%	875	No	No
121030272022	169	16.3%	0	0.0%	1036	No	No
121030272023	210	11.9%	19	1.1%	1768	No	No
121030272024	56	6.8%	130	15.8%	822	No	Yes
121030272025	130	13.2%	206	20.9%	987	No	Yes
121030272041	148	9.4%	80	5.1%	1568	No	No
121030272042	43	5.9%	92	12.6%	729	No	No
121030272043	642	23.6%	60	2.2%	2724	No	No
121030272051	397	17.0%	265	11.3%	2339	No	No
121030272052	266	18.1%	172	11.7%	1469	No	No
121030272053	434	18.0%	268	11.1%	2408	No	No
121030272054	31	5.4%	14	2.4%	576	No	No
121030272061	81	4.8%	70	4.1%	1686	No	No
121030272062	347	16.3%	223	10.5%	2129	No	No
121030272063	369	14.7%	0	0.0%	2514	No	No
121030272071	211	8.3%	52	2.0%	2556	No	No
121030272072	88	14.9%	21	3.6%	589	No	No
121030272073	38	4.6%	155	18.8%	824	No	Yes
121030272074	136	12.3%	156	14.1%	1106	No	Yes
121030272081	0	0.0%	14	1.6%	898	No	No
121030272082	454	17.0%	576	21.6%	2664	No	Yes
121030272083	114	6.6%	42	2.4%	1740	No	No
121030272084	212	10.3%	171	8.3%	2053	No	No
121030272091	14	3.6%	64	16.7%	384	No	Yes
121030272092	70	8.6%	132	16.2%	815	No	Yes
121030272101	126	11.3%	95	8.6%	1111	No	No
121030272102	92	6.9%	219	16.5%	1331	No	Yes
121030272103	22	2.5%	117	13.3%	880	No	Yes
121030272104	34	4.1%	515	62.5%	824	No	Yes
121030272105	135	18.9%	137	19.2%	715	No	Yes
121030273081	162	13.7%	84	7.1%	1184	No	No
121030273082	790	29.1%	639	23.5%	2716	Yes	Yes

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030273091	268	13.9%	158	8.2%	1925	No	No
121030273101	201	9.8%	211	10.3%	2045	No	No
121030273102	449	27.0%	18	1.1%	1666	Yes	No
121030273103	727	22.2%	413	12.6%	3280	No	No
121030273104	192	11.2%	12	0.7%	1716	No	No
121030273141	939	41.7%	142	6.3%	2253	Yes	No
121030273142	99	7.0%	58	4.1%	1416	No	No
121030273151	466	22.2%	68	3.2%	2097	No	No
121030273152	10	0.8%	63	5.1%	1220	No	No
121030273153	49	5.7%	0	0.0%	866	No	No
121030273154	399	22.2%	240	13.4%	1801	No	Yes
121030273161	40	3.1%	99	7.6%	1301	No	No
121030273162	95	4.9%	199	10.2%	1945	No	No
121030273163	221	33.3%	0	0.0%	663	Yes	No
121030273171	243	16.6%	35	2.4%	1468	No	No
121030273172	184	9.6%	130	6.8%	1920	No	No
121030273173	390	18.5%	112	5.3%	2105	No	No
121030273181	522	32.5%	127	7.9%	1604	Yes	No
121030273182	326	13.6%	70	2.9%	2400	No	No
121030273191	907	51.8%	305	17.4%	1752	Yes	Yes
121030273192	368	17.5%	30	1.4%	2097	No	No
121030273193	114	8.0%	42	2.9%	1432	No	No
121030273201	301	24.4%	206	16.7%	1232	No	Yes
121030273202	393	17.6%	91	4.1%	2233	No	No
121030273203	95	12.6%	57	7.6%	752	No	No
121030273211	185	11.7%	79	5.0%	1584	No	No
121030273221	156	5.6%	331	11.8%	2797	No	No
121030273222	0	0.0%	57	8.8%	650	No	No
121030273223	0	0.0%	32	12.2%	263	No	No
121030273224	307	11.5%	87	3.3%	2665	No	No
121030273231	17	1.8%	0	0.0%	921	No	No
121030273232	475	22.4%	177	8.3%	2121	No	No
121030273241	61	7.3%	33	4.0%	832	No	No
121030273242	112	6.2%	17	1.0%	1794	No	No
121030273243	245	17.8%	190	13.8%	1379	No	Yes
121030273251	327	17.8%	53	2.9%	1840	No	No
121030273252	259	13.4%	157	8.1%	1934	No	No
121030273261	535	25.5%	219	10.4%	2098	No	No
121030273262	493	31.2%	142	9.0%	1582	Yes	No
121030273271	302	15.5%	113	5.8%	1950	No	No

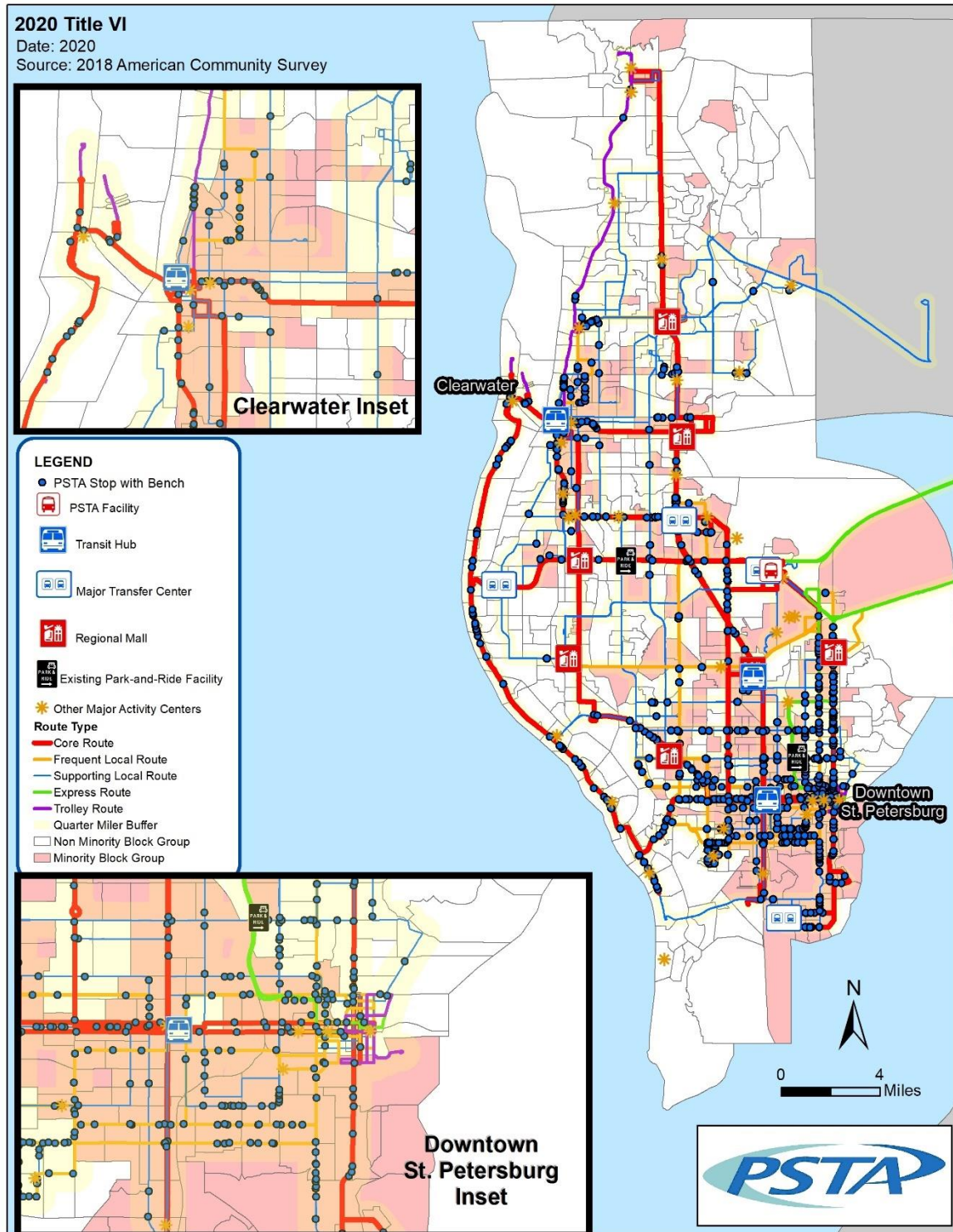
Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030273272	868	32.4%	297	11.1%	2681	Yes	No
121030274011	415	24.1%	201	11.7%	1724	No	No
121030274012	121	12.2%	101	10.2%	988	No	No
121030274021	583	88.1%	339	51.2%	662	Yes	Yes
121030274022	173	31.9%	40	7.4%	543	Yes	No
121030274023	146	7.8%	64	3.4%	1865	No	No
121030274024	204	17.6%	139	12.0%	1162	No	No
121030274025	1173	62.8%	300	16.1%	1867	Yes	Yes
121030274031	330	18.4%	174	9.7%	1794	No	No
121030275011	134	5.1%	373	14.2%	2620	No	Yes
121030275012	10	1.5%	6	0.9%	678	No	No
121030275013	9	1.9%	77	16.7%	462	No	Yes
121030275014	233	12.1%	136	7.1%	1921	No	No
121030275021	63	3.3%	252	13.0%	1932	No	Yes
121030275022	319	10.2%	433	13.8%	3128	No	Yes
121030275023	282	10.9%	387	15.0%	2577	No	Yes
121030276031	54	3.4%	234	14.8%	1584	No	Yes
121030276032	12	2.0%	57	9.7%	587	No	No
121030276033	19	8.3%	36	15.8%	228	No	Yes
121030276041	225	15.1%	68	4.6%	1490	No	No
121030276042	17	3.1%	39	7.1%	553	No	No
121030276051	168	10.3%	130	8.0%	1632	No	No
121030276061	46	7.1%	48	7.4%	648	No	No
121030276062	46	3.9%	106	9.0%	1176	No	No
121030277011	149	7.4%	99	4.9%	2021	No	No
121030277012	41	6.4%	35	5.5%	639	No	No
121030277031	26	4.8%	45	8.3%	541	No	No
121030277032	9	1.6%	15	2.7%	549	No	No
121030277041	10	5.0%	11	5.4%	202	No	No
121030277042	81	9.6%	76	9.0%	848	No	No
121030277043	56	9.5%	57	9.7%	588	No	No
121030277044	133	14.4%	84	9.1%	922	No	No
121030278011	25	4.0%	37	5.9%	630	No	No
121030278012	119	12.3%	85	8.8%	965	No	No
121030278021	97	10.7%	43	4.7%	907	No	No
121030278022	60	3.4%	258	14.6%	1763	No	Yes
121030279011	56	16.4%	24	7.0%	342	No	No
121030279012	86	7.9%	30	2.8%	1085	No	No
121030279013	69	7.4%	73	7.8%	932	No	No
121030279031	168	11.2%	125	8.4%	1495	No	No

Block Group ID	Total Minority Population	Percent Minority	Total Low-Income Population	Percent Low-Income	Total Population	Minority Block Group	Low-Income Block Group
121030279041	49	4.5%	119	11.0%	1082	No	No
121030279042	119	10.1%	79	6.7%	1174	No	No
121030279043	151	19.7%	69	9.0%	765	No	No
121030280021	177	11.5%	58	3.8%	1541	No	No
121030280022	131	15.8%	47	5.7%	829	No	No
121030280023	51	9.6%	35	6.6%	534	No	No
121030280024	176	14.2%	177	14.3%	1241	No	Yes
121030280031	35	3.6%	31	3.2%	965	No	No
121030280032	48	5.0%	213	22.4%	951	No	Yes
121030280033	56	10.9%	84	16.3%	514	No	Yes
121030280034	16	1.9%	99	11.8%	836	No	No
121030280041	52	5.4%	45	4.7%	958	No	No
121030280042	50	4.8%	75	7.1%	1050	No	No
121030281021	58	8.3%	71	10.1%	702	No	No
121030281022	160	17.7%	348	38.5%	903	No	Yes
121030281023	179	10.5%	212	12.4%	1711	No	No
121030281031	16	3.2%	49	9.7%	507	No	No
121030281032	137	12.3%	169	15.2%	1118	No	Yes
121030281041	8	1.6%	52	10.2%	512	No	No
121030281042	168	11.0%	122	8.0%	1528	No	No
121030281043	29	5.0%	77	13.3%	580	No	Yes
121030281044	45	5.9%	90	11.8%	765	No	No
121030282001	180	18.5%	76	7.8%	974	No	No
121030282002	50	9.9%	8	1.7%	503	No	No
121030282003	65	6.4%	98	9.7%	1015	No	No
121030283001	413	42.5%	183	18.8%	971	Yes	Yes
121030283002	336	34.3%	191	19.5%	981	Yes	Yes
121030283003	33	4.4%	78	10.4%	751	No	No
121030283004	184	24.3%	166	22.0%	756	No	Yes
121030284011	17	3.2%	35	6.6%	533	No	No
121030284012	17	1.6%	151	14.5%	1043	No	Yes
121030284021	14	2.3%	56	9.3%	602	No	No
121030284022	118	16.8%	118	16.8%	702	No	Yes
121030285001	217	18.7%	260	22.4%	1162	No	Yes
121030285002	159	18.2%	96	11.0%	876	No	No
121030286001	642	51.0%	591	47.0%	1259	Yes	Yes
121030286002	323	24.8%	175	13.5%	1301	No	Yes
121030286003	336	21.1%	114	7.2%	1589	No	No
121030287001	1562	98.9%	814	51.6%	1579	Yes	Yes
121030287002	1217	95.8%	604	47.5%	1271	Yes	Yes

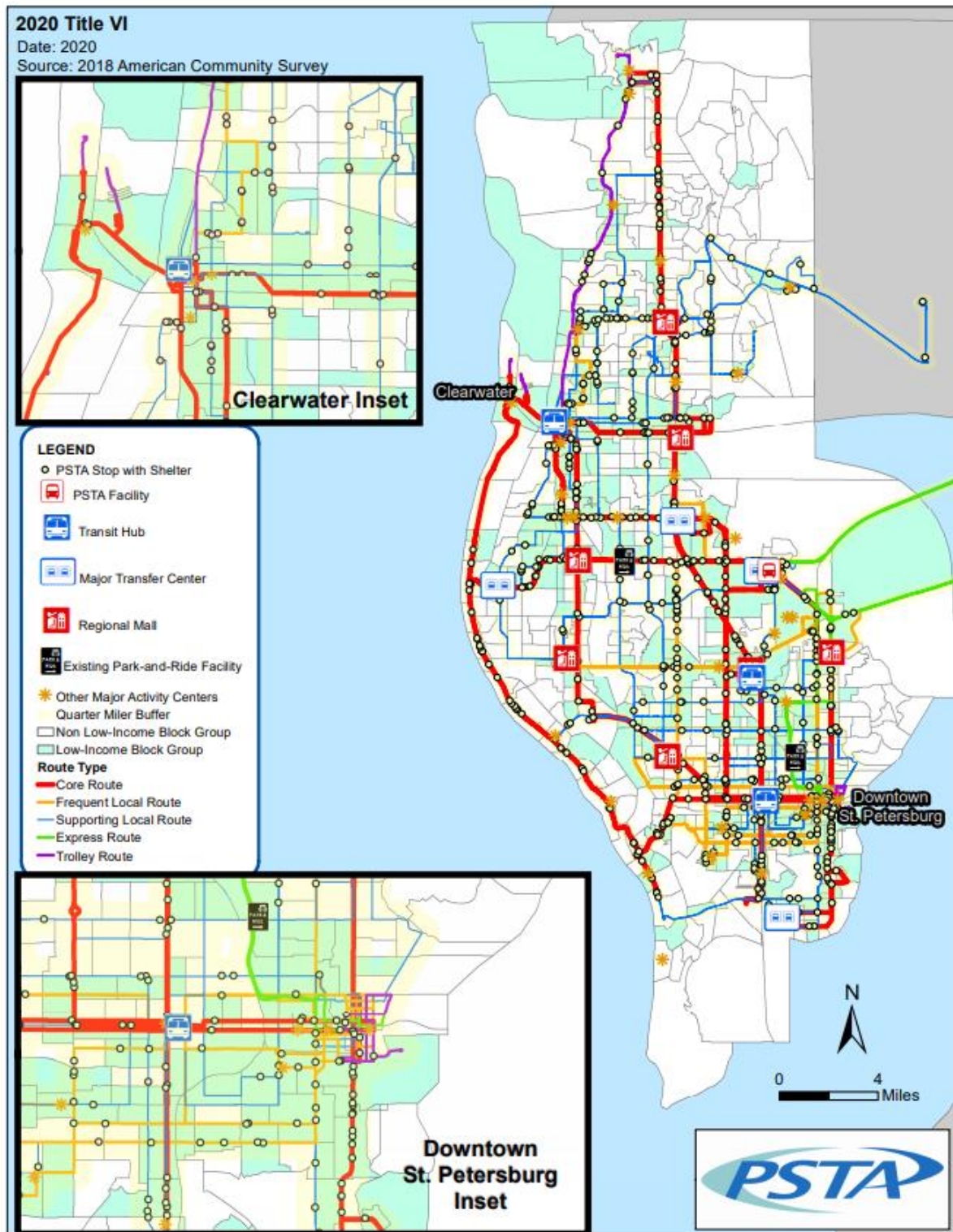
Map D-1: PSTA Shelter Distribution – Minority Block Groups



Map D-2: PSTA Bench Distribution – Minority Block Groups



Map D-3: PSTA Shelter Distribution – Low Income Block Groups



Map D-4: PSTA Benches Distribution – Low Income Block Groups

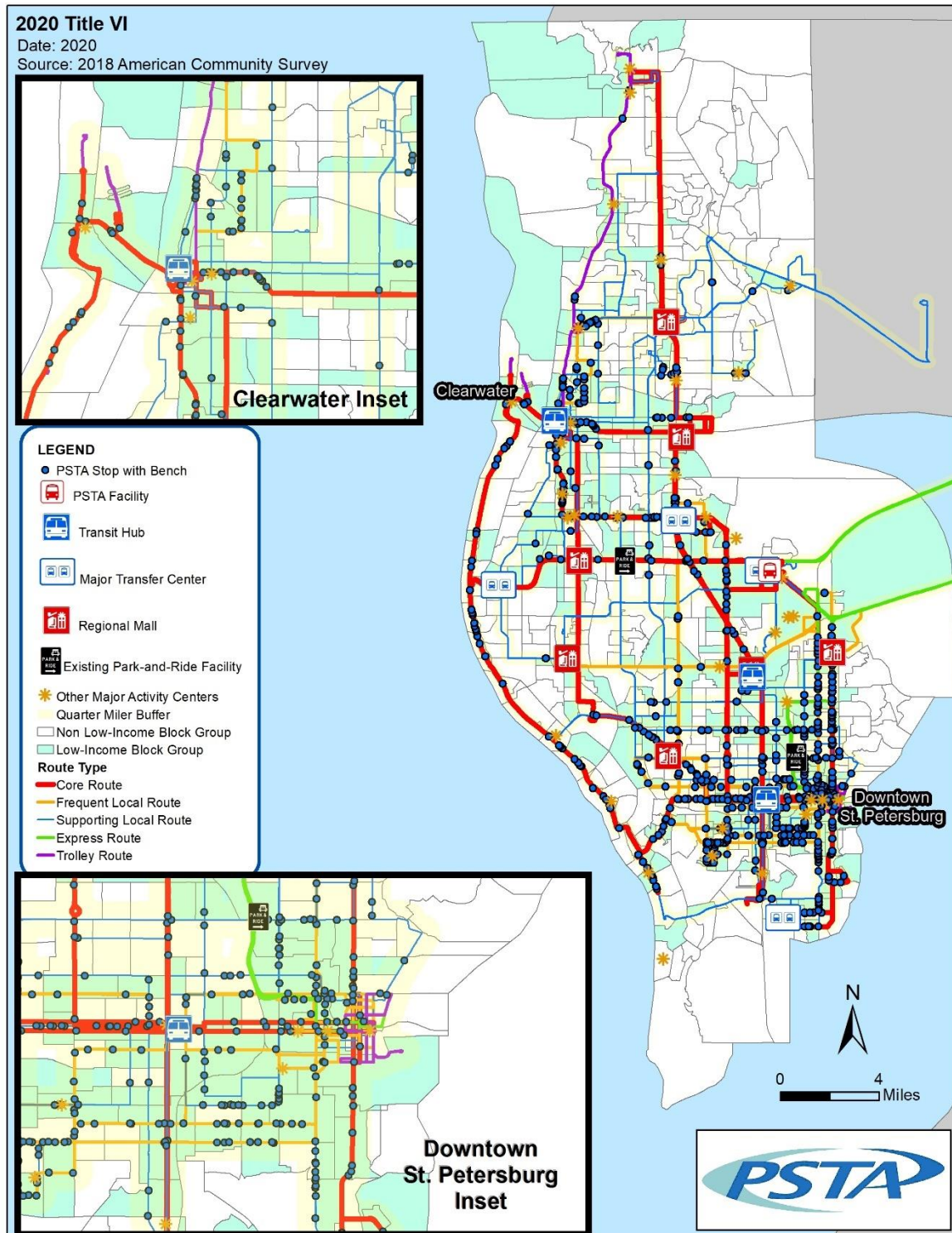


Table D-2: PSTA Shelter and Benches Distribution by Census Block Group (PSTA June 2020 Amenity Shapefile & 2014-2018 5-Year ACS)

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030201011	2	6	Yes	Yes	No
121030201012	6	2	Yes	Yes	No
121030201013	1	3	Yes	No	No
121030201014	1	1	Yes	No	No
121030201051	1	0	Yes	No	Yes
121030201052	0	0	No	No	No
121030201053	5	2	Yes	No	No
121030201061	0	0	No	No	No
121030201062	0	0	No	No	No
121030201063	0	0	No	No	No
121030201064	0	0	No	No	No
121030201071	0	0	No	No	No
121030201072	0	0	No	No	No
121030201081	0	0	No	No	No
121030201082	0	0	No	Yes	No
121030201083	0	0	No	No	No
121030202011	1	3	Yes	No	No
121030202012	0	0	Yes	Yes	No
121030202013	0	0	Yes	No	No
121030202021	1	0	No	No	No
121030202022	1	3	Yes	Yes	No
121030202023	0	1	Yes	No	No
121030202061	2	2	Yes	No	No
121030202062	1	0	Yes	Yes	No
121030202071	0	2	Yes	No	No
121030202072	2	2	Yes	No	No
121030202081	2	1	Yes	Yes	No
121030202082	1	3	Yes	Yes	No
121030202091	0	1	Yes	No	No
121030202092	2	4	Yes	Yes	No
121030202093	1	1	Yes	No	No
121030202094	1	2	Yes	No	No
121030203011	2	2	Yes	Yes	No
121030203012	5	3	Yes	No	Yes
121030203013	1	1	Yes	Yes	No
121030203014	0	0	Yes	Yes	No
121030203021	0	0	Yes	No	No
121030203022	0	0	Yes	Yes	No
121030203023	1	2	Yes	Yes	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030204001	0	0	Yes	No	No
121030204002	0	0	Yes	No	No
121030204003	6	2	Yes	Yes	No
121030205001	2	2	Yes	Yes	No
121030205002	2	1	Yes	Yes	No
121030205003	0	3	Yes	Yes	Yes
121030205004	0	1	Yes	Yes	Yes
121030206001	0	3	Yes	Yes	No
121030206002	1	1	Yes	Yes	No
121030206003	1	4	Yes	No	No
121030206004	2	4	Yes	Yes	No
121030207001	0	1	Yes	Yes	No
121030207002	0	4	Yes	No	No
121030207003	0	0	Yes	No	No
121030207004	2	5	Yes	Yes	No
121030208001	1	0	Yes	Yes	No
121030208002	1	2	Yes	No	No
121030208003	1	0	Yes	Yes	No
121030208004	1	2	Yes	Yes	No
121030208005	0	2	Yes	Yes	No
121030208006	0	2	Yes	Yes	No
121030212001	1	1	Yes	Yes	No
121030212002	1	2	Yes	Yes	No
121030212003	1	3	Yes	Yes	No
121030212004	1	3	Yes	Yes	No
121030215001	2	7	No	Yes	Yes
121030215002	1	6	Yes	Yes	No
121030215003	0	1	No	No	No
121030216001	2	4	Yes	Yes	Yes
121030216002	3	3	Yes	Yes	Yes
121030216003	0	5	Yes	Yes	No
121030218001	0	1	Yes	Yes	No
121030218002	1	4	Yes	Yes	No
121030218003	2	1	No	Yes	No
121030218004	0	2	Yes	No	No
121030219001	0	0	Yes	Yes	No
121030219002	0	0	Yes	No	No
121030219003	0	1	No	No	Yes
121030219004	2	15	Yes	No	No
121030219005	1	3	Yes	Yes	No
121030220001	1	2	Yes	No	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030220002	1	4	Yes	Yes	No
121030220003	3	0	Yes	Yes	No
121030220004	1	2	Yes	Yes	No
121030221001	1	1	No	Yes	Yes
121030221002	2	3	Yes	Yes	No
121030221003	0	5	Yes	No	Yes
121030221004	1	3	Yes	No	No
121030221005	1	2	No	No	No
121030222001	2	1	No	Yes	No
121030222002	1	2	Yes	No	Yes
121030222003	1	4	Yes	Yes	Yes
121030222004	2	3	Yes	No	No
121030223011	1	2	No	No	No
121030223012	0	1	Yes	No	No
121030223013	0	1	No	No	No
121030223021	3	2	No	No	Yes
121030223022	1	3	No	No	No
121030223023	3	7	No	No	No
121030224011	0	0	Yes	No	No
121030224012	0	0	No	No	No
121030224013	0	0	No	Yes	Yes
121030224014	0	0	No	No	Yes
121030224021	1	6	No	Yes	No
121030224022	0	1	No	No	No
121030224023	0	0	No	No	No
121030224024	1	1	No	Yes	No
121030224025	0	3	No	Yes	No
121030224026	0	2	No	No	No
121030225011	2	1	Yes	No	Yes
121030225012	4	6	No	No	No
121030225013	0	2	Yes	No	Yes
121030225021	1	0	Yes	No	Yes
121030225022	0	0	Yes	Yes	No
121030225023	6	9	No	No	Yes
121030225031	0	2	No	No	No
121030225032	0	1	No	No	Yes
121030225033	2	1	Yes	No	No
121030226011	1	1	No	No	No
121030226012	0	0	Yes	No	Yes
121030226013	0	1	Yes	No	Yes
121030226021	0	1	No	Yes	Yes

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030226022	1	1	No	No	No
121030226023	1	1	Yes	No	Yes
121030227001	3	1	Yes	No	Yes
121030227002	0	0	No	No	No
121030227003	0	2	No	No	Yes
121030228011	1	4	Yes	Yes	Yes
121030228012	2	2	Yes	No	Yes
121030228013	0	0	Yes	Yes	Yes
121030228021	1	0	Yes	No	Yes
121030228022	0	0	Yes	No	Yes
121030228023	0	0	Yes	No	Yes
121030229011	4	6	Yes	No	Yes
121030229012	0	3	Yes	No	Yes
121030229021	0	1	Yes	Yes	Yes
121030229022	0	1	Yes	Yes	No
121030229023	1	1	Yes	Yes	Yes
121030230001	1	1	Yes	Yes	Yes
121030230002	0	1	No	Yes	Yes
121030231001	0	5	Yes	No	Yes
121030231002	1	1	Yes	Yes	Yes
121030232001	1	0	No	Yes	Yes
121030232002	2	0	No	No	No
121030232003	0	2	No	No	No
121030233001	0	4	No	Yes	No
121030233002	0	2	No	Yes	No
121030233003	0	3	No	Yes	No
121030234001	0	1	No	Yes	No
121030234002	1	5	Yes	Yes	Yes
121030235001	0	4	No	Yes	Yes
121030235002	0	1	No	Yes	No
121030235003	1	5	Yes	Yes	No
121030236001	0	0	No	No	No
121030236002	0	3	No	No	No
121030236003	0	3	No	Yes	No
121030237001	0	0	No	No	No
121030237002	0	0	No	No	No
121030237003	0	0	No	No	Yes
121030238001	0	2	No	No	No
121030238002	0	3	No	No	No
121030239001	5	2	No	No	Yes
121030239002	1	3	No	No	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030240011	0	0	No	No	No
121030240012	0	0	No	No	No
121030240021	0	0	No	No	No
121030240022	0	0	Yes	No	Yes
121030240023	0	0	No	No	No
121030240041	0	0	Yes	No	No
121030240042	0	0	No	No	No
121030240043	0	0	No	No	No
121030240051	0	0	No	No	No
121030240052	0	0	No	No	Yes
121030241001	0	1	No	No	Yes
121030241002	0	3	No	No	No
121030241003	2	3	No	Yes	Yes
121030241004	1	7	No	Yes	Yes
121030242001	0	2	No	Yes	No
121030242002	0	1	No	Yes	No
121030242003	0	0	No	No	No
121030242004	1	3	Yes	Yes	Yes
121030242005	0	3	No	Yes	No
121030243011	1	0	Yes	Yes	No
121030243012	3	0	No	No	Yes
121030243013	0	1	No	No	No
121030243014	1	0	Yes	No	No
121030243021	0	0	Yes	Yes	Yes
121030243022	0	0	No	No	Yes
121030243023	2	1	Yes	No	Yes
121030244031	1	4	Yes	No	No
121030244032	3	4	Yes	Yes	Yes
121030244033	1	4	Yes	No	Yes
121030244061	2	1	Yes	Yes	Yes
121030244062	1	0	No	Yes	No
121030244063	0	0	Yes	No	Yes
121030244081	0	0	Yes	Yes	No
121030244082	1	1	Yes	Yes	Yes
121030244083	0	6	No	No	Yes
121030244091	0	0	No	No	No
121030244092	0	0	No	No	No
121030244101	6	3	Yes	Yes	Yes
121030244102	2	3	Yes	No	Yes
121030244111	0	0	No	No	Yes
121030244112	2	2	No	Yes	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030244113	0	0	No	No	No
121030244114	0	0	No	No	No
121030244121	9	0	No	No	No
121030244122	3	1	Yes	Yes	Yes
121030244131	0	2	Yes	No	Yes
121030244132	0	0	No	No	No
121030244133	3	0	No	No	No
121030244134	0	2	No	No	Yes
121030245051	5	1	No	No	No
121030245052	1	0	Yes	No	Yes
121030245053	1	0	No	Yes	Yes
121030245054	2	1	Yes	No	Yes
121030245071	1	3	No	No	No
121030245072	0	0	Yes	No	Yes
121030245081	1	1	Yes	No	Yes
121030245082	1	0	Yes	Yes	No
121030245091	5	0	No	No	No
121030245092	0	0	Yes	No	Yes
121030245093	0	0	No	No	No
121030245101	2	2	Yes	No	Yes
121030245102	0	2	Yes	Yes	Yes
121030245103	1	1	Yes	Yes	No
121030245111	0	0	Yes	No	No
121030245112	0	0	Yes	No	No
121030245113	1	0	Yes	Yes	No
121030245121	0	0	No	No	No
121030245122	23	10	No	Yes	No
121030245131	1	1	No	No	No
121030245132	2	0	No	Yes	No
121030245133	3	0	Yes	No	Yes
121030245141	5	4	Yes	Yes	Yes
121030245142	4	1	Yes	Yes	Yes
121030245143	2	4	Yes	Yes	Yes
121030246011	1	0	No	Yes	Yes
121030246012	1	0	No	Yes	No
121030246013	2	0	No	Yes	Yes
121030246021	0	0	Yes	Yes	Yes
121030246022	0	1	Yes	Yes	Yes
121030246023	1	0	Yes	Yes	Yes
121030246024	0	0	No	No	Yes
121030247011	2	2	Yes	Yes	Yes

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030247012	0	1	Yes	No	Yes
121030247013	1	0	Yes	Yes	Yes
121030247021	0	0	Yes	Yes	No
121030247022	0	0	No	No	No
121030247023	1	0	Yes	Yes	Yes
121030247031	0	0	Yes	No	Yes
121030247032	0	0	Yes	No	No
121030247033	0	0	Yes	Yes	Yes
121030248011	1	0	No	No	Yes
121030248012	1	0	No	Yes	No
121030248031	1	0	No	Yes	Yes
121030248032	1	0	Yes	No	Yes
121030248041	2	0	Yes	Yes	Yes
121030248051	0	0	Yes	No	Yes
121030248052	0	0	Yes	No	Yes
121030249011	0	0	Yes	Yes	Yes
121030249012	1	1	No	Yes	No
121030249013	0	0	Yes	No	Yes
121030249021	1	3	No	Yes	Yes
121030249022	6	5	Yes	Yes	Yes
121030249023	2	0	Yes	Yes	Yes
121030249024	0	1	Yes	Yes	Yes
121030249041	1	0	No	No	Yes
121030249042	0	0	Yes	Yes	Yes
121030249051	0	1	No	Yes	Yes
121030249052	0	0	Yes	No	Yes
121030249053	0	0	Yes	No	No
121030249061	1	0	Yes	Yes	Yes
121030249062	0	0	Yes	No	Yes
121030249063	1	0	No	Yes	Yes
121030250041	1	1	No	No	Yes
121030250042	0	0	Yes	Yes	Yes
121030250043	2	0	Yes	Yes	Yes
121030250044	3	0	Yes	Yes	Yes
121030250071	0	0	No	No	No
121030250072	0	0	No	No	No
121030250073	0	0	No	No	No
121030250091	2	0	No	No	Yes
121030250092	4	0	Yes	Yes	Yes
121030250101	0	1	No	No	No
121030250102	0	1	No	No	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030250103	2	0	No	No	Yes
121030250104	3	1	No	No	Yes
121030250111	0	0	No	No	Yes
121030250112	4	1	Yes	No	No
121030250113	0	0	No	No	No
121030250121	0	0	No	No	No
121030250122	1	0	No	No	No
121030250123	0	0	No	No	No
121030250131	0	0	No	No	No
121030250132	0	0	No	No	No
121030250133	0	0	No	Yes	Yes
121030250141	4	2	No	No	Yes
121030250142	1	0	Yes	No	Yes
121030250143	1	0	No	No	Yes
121030250151	1	0	No	No	Yes
121030250152	0	1	No	Yes	No
121030250161	0	0	Yes	No	Yes
121030250171	0	0	No	No	Yes
121030250172	0	2	No	No	No
121030250181	0	0	Yes	Yes	Yes
121030250182	0	1	No	Yes	No
121030250183	0	0	Yes	Yes	Yes
121030250191	2	1	No	Yes	No
121030250192	0	0	No	Yes	No
121030251061	4	0	No	No	No
121030251062	0	2	No	No	No
121030251071	1	0	No	No	No
121030251072	1	0	No	No	Yes
121030251073	0	0	No	Yes	No
121030251081	1	0	No	No	No
121030251082	0	0	No	Yes	No
121030251091	0	0	No	Yes	No
121030251092	0	0	No	Yes	Yes
121030251093	0	0	No	No	No
121030251101	0	0	No	No	No
121030251102	0	0	No	Yes	Yes
121030251103	0	0	No	No	No
121030251104	0	0	No	No	No
121030251111	0	0	No	Yes	No
121030251112	1	0	No	Yes	No
121030251113	1	0	No	No	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030251121	1	0	Yes	No	No
121030251122	1	0	No	No	No
121030251123	0	0	No	No	No
121030251131	1	0	No	No	No
121030251132	0	1	No	Yes	Yes
121030251133	0	0	No	No	No
121030251141	1	0	No	Yes	No
121030251142	0	0	No	No	No
121030251151	0	0	No	No	No
121030251152	0	0	No	Yes	No
121030251161	0	0	No	Yes	No
121030251162	0	0	No	No	No
121030251191	1	0	No	No	No
121030251192	0	0	No	No	No
121030251193	1	0	No	No	No
121030251201	0	0	No	No	No
121030251202	0	0	No	No	No
121030251203	0	0	No	No	No
121030251211	0	0	No	No	No
121030251212	0	1	No	No	No
121030251221	0	0	No	No	No
121030251222	0	0	No	No	No
121030251223	0	0	No	No	No
121030251231	0	0	No	No	No
121030251232	0	0	No	No	No
121030252031	2	0	No	Yes	No
121030252032	0	0	No	No	No
121030252033	0	0	No	No	No
121030252041	3	0	No	Yes	No
121030252042	1	1	No	No	No
121030252051	0	0	No	No	No
121030252052	0	0	No	No	No
121030252053	1	0	No	No	No
121030252071	1	1	No	Yes	No
121030252072	2	1	Yes	Yes	No
121030252073	6	0	No	No	No
121030252081	0	0	No	Yes	No
121030252082	1	1	No	Yes	No
121030252091	1	0	No	Yes	No
121030252092	1	0	No	No	No
121030252093	0	0	No	No	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030253031	2	1	No	Yes	Yes
121030253032	0	1	No	No	No
121030253033	3	0	No	No	No
121030253041	0	0	No	Yes	No
121030253042	3	0	No	No	No
121030253043	1	1	No	No	No
121030253051	0	0	No	Yes	No
121030253052	0	0	Yes	No	Yes
121030253061	1	1	No	Yes	No
121030253071	1	1	No	Yes	No
121030253072	5	1	Yes	Yes	No
121030253073	0	0	No	No	No
121030253081	0	0	No	Yes	No
121030253082	0	0	No	No	No
121030254011	0	0	No	No	No
121030254012	0	0	No	Yes	No
121030254013	0	1	No	No	Yes
121030254014	0	0	No	No	No
121030254051	1	1	No	No	No
121030254052	0	0	No	Yes	No
121030254053	0	1	No	Yes	No
121030254071	1	0	No	No	Yes
121030254072	2	0	Yes	Yes	Yes
121030254073	0	0	No	No	No
121030254081	0	0	Yes	No	Yes
121030254082	0	0	No	No	No
121030254083	2	1	Yes	Yes	Yes
121030254111	3	1	Yes	Yes	Yes
121030254121	1	0	Yes	No	Yes
121030254122	0	0	Yes	No	Yes
121030254123	0	1	No	Yes	No
121030254124	0	0	No	Yes	No
121030254131	0	0	No	No	Yes
121030254132	2	0	No	Yes	Yes
121030254133	0	0	No	No	No
121030254141	3	5	No	Yes	Yes
121030254142	1	3	No	No	No
121030254151	0	1	No	No	No
121030254152	1	2	Yes	No	Yes
121030254161	0	1	Yes	No	Yes
121030254162	1	1	No	No	Yes

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030254171	0	0	No	No	No
121030254172	0	0	No	Yes	No
121030255011	0	0	No	Yes	Yes
121030255012	0	0	No	No	No
121030255013	0	0	No	No	Yes
121030255031	0	0	No	Yes	No
121030255032	1	1	No	No	No
121030255033	0	1	No	Yes	Yes
121030255051	0	3	Yes	Yes	Yes
121030255061	1	0	No	No	No
121030255062	1	0	Yes	Yes	Yes
121030255063	0	0	No	No	No
121030255064	1	0	No	Yes	Yes
121030256021	1	3	Yes	Yes	Yes
121030256022	1	5	Yes	No	No
121030256023	2	2	No	No	Yes
121030256031	3	0	Yes	Yes	Yes
121030256032	2	2	Yes	Yes	No
121030256033	4	0	No	No	No
121030256041	0	2	No	Yes	Yes
121030257001	0	0	No	No	Yes
121030257002	1	0	No	No	No
121030257003	0	0	No	No	No
121030257004	0	2	No	No	No
121030258001	0	0	Yes	Yes	Yes
121030258002	2	1	Yes	Yes	Yes
121030258003	2	1	Yes	Yes	No
121030259001	3	3	Yes	Yes	Yes
121030259002	3	2	No	No	No
121030259003	1	1	Yes	Yes	Yes
121030259004	3	0	Yes	Yes	Yes
121030259005	0	4	Yes	Yes	Yes
121030259006	0	9	No	No	No
121030260011	0	0	No	No	Yes
121030260012	0	1	No	Yes	No
121030260013	0	2	No	Yes	No
121030260021	0	0	No	No	No
121030260022	1	2	No	Yes	No
121030260023	2	2	No	Yes	Yes
121030261011	0	4	No	Yes	Yes
121030261012	0	1	Yes	Yes	Yes

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030261013	0	5	Yes	No	Yes
121030261021	0	0	No	No	No
121030261022	0	3	Yes	Yes	No
121030262001	3	3	Yes	Yes	No
121030262002	2	1	Yes	Yes	No
121030263001	0	1	Yes	Yes	Yes
121030263002	2	1	Yes	Yes	Yes
121030263003	2	0	Yes	Yes	No
121030263004	4	6	Yes	Yes	No
121030263005	0	0	Yes	No	No
121030263006	0	0	Yes	Yes	Yes
121030264001	0	4	Yes	Yes	Yes
121030264002	2	4	Yes	Yes	Yes
121030264003	0	1	Yes	Yes	Yes
121030264004	1	0	No	No	No
121030264005	1	0	Yes	No	Yes
121030265001	0	0	Yes	Yes	Yes
121030265002	0	0	Yes	No	Yes
121030265003	1	0	Yes	Yes	Yes
121030265004	0	0	No	Yes	No
121030265005	0	0	Yes	No	No
121030265006	1	1	Yes	Yes	No
121030266011	1	0	No	No	Yes
121030266012	2	0	Yes	Yes	No
121030266013	0	0	No	No	No
121030266014	0	0	No	No	No
121030266021	3	0	Yes	No	Yes
121030266022	0	0	No	Yes	No
121030267011	1	0	Yes	No	Yes
121030267012	0	0	Yes	No	Yes
121030267013	0	0	Yes	No	Yes
121030267014	1	0	Yes	Yes	Yes
121030267021	0	0	Yes	No	Yes
121030267022	2	0	Yes	Yes	No
121030267023	0	0	No	No	Yes
121030267024	0	0	No	No	No
121030267025	2	1	No	No	No
121030267026	0	0	Yes	No	No
121030267031	0	0	No	Yes	Yes
121030267032	2	1	No	Yes	No
121030267033	0	1	Yes	Yes	Yes

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030267034	4	1	Yes	Yes	Yes
121030267035	1	2	Yes	Yes	Yes
121030268041	2	0	No	No	No
121030268042	0	0	Yes	No	Yes
121030268043	0	0	No	No	No
121030268091	0	0	No	No	No
121030268092	0	0	No	Yes	No
121030268111	0	0	Yes	No	Yes
121030268112	0	0	No	No	No
121030268113	3	0	No	No	No
121030268114	0	0	Yes	No	Yes
121030268121	5	1	No	No	Yes
121030268122	3	0	No	No	Yes
121030268131	4	0	No	No	No
121030268132	0	1	Yes	No	Yes
121030268141	1	1	No	No	No
121030268151	0	0	No	No	No
121030268152	1	0	No	No	No
121030268153	0	0	No	No	Yes
121030268161	0	0	No	No	Yes
121030268162	0	0	No	Yes	No
121030268163	1	2	No	No	No
121030268164	0	0	No	No	No
121030268165	0	0	No	No	No
121030268171	0	0	No	No	No
121030268172	0	0	Yes	No	Yes
121030268173	0	0	Yes	No	No
121030268181	1	2	Yes	Yes	Yes
121030268182	1	0	Yes	Yes	Yes
121030268183	0	0	No	No	Yes
121030268191	4	0	No	Yes	Yes
121030268192	2	0	Yes	Yes	Yes
121030268201	1	1	No	No	No
121030268202	1	0	No	No	No
121030268203	0	0	No	No	Yes
121030268211	0	0	Yes	No	Yes
121030269041	0	0	No	No	Yes
121030269042	0	1	Yes	Yes	Yes
121030269043	2	1	No	Yes	No
121030269071	2	1	No	No	No
121030269072	0	0	No	No	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030269073	4	1	No	No	No
121030269081	0	0	No	No	No
121030269082	0	0	No	No	No
121030269083	0	0	No	No	No
121030269084	1	0	No	Yes	No
121030269091	1	0	Yes	Yes	Yes
121030269092	1	0	No	No	No
121030269093	1	0	No	No	No
121030269101	4	0	No	No	No
121030269102	1	0	No	No	No
121030269103	0	0	Yes	No	No
121030269104	0	0	No	No	No
121030269111	1	0	No	No	No
121030269112	0	0	No	No	No
121030269113	0	0	No	No	No
121030269121	0	1	No	Yes	Yes
121030269122	0	0	No	No	No
121030269123	1	1	No	No	No
121030269124	1	3	Yes	No	No
121030269131	0	0	No	No	No
121030269132	0	0	No	Yes	Yes
121030269133	0	0	No	No	No
121030269134	1	0	No	Yes	Yes
121030270001	0	0	No	No	No
121030270002	0	0	No	Yes	No
121030270003	1	0	No	No	No
121030270004	1	0	Yes	No	Yes
121030271011	3	5	No	Yes	No
121030271012	1	6	No	Yes	No
121030271013	1	0	No	Yes	Yes
121030271051	0	2	No	No	No
121030271052	1	0	No	No	No
121030271061	2	0	No	No	Yes
121030271062	1	0	No	No	No
121030271063	1	0	No	No	No
121030271064	0	0	No	Yes	No
121030272021	0	0	No	No	No
121030272022	0	0	No	No	No
121030272023	0	1	No	No	No
121030272024	0	0	No	Yes	No
121030272025	0	0	No	Yes	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030272041	0	0	No	No	No
121030272042	0	0	No	No	No
121030272043	1	0	No	No	Yes
121030272051	1	0	No	No	No
121030272052	1	0	No	No	No
121030272053	2	0	No	No	Yes
121030272054	1	0	No	No	No
121030272061	0	0	No	No	No
121030272062	3	0	No	No	Yes
121030272063	0	0	No	No	No
121030272071	1	0	No	No	No
121030272072	0	0	No	No	Yes
121030272073	0	0	No	Yes	No
121030272074	0	0	No	Yes	Yes
121030272081	0	0	No	No	No
121030272082	0	1	No	Yes	No
121030272083	0	0	No	No	No
121030272084	1	0	No	No	No
121030272091	0	0	No	Yes	No
121030272092	1	0	No	Yes	No
121030272101	1	0	No	No	Yes
121030272102	0	0	No	Yes	Yes
121030272103	0	0	No	Yes	No
121030272104	0	0	No	Yes	Yes
121030272105	0	0	No	Yes	No
121030273081	0	0	No	No	No
121030273082	0	0	Yes	Yes	No
121030273091	0	0	No	No	No
121030273101	0	0	No	No	No
121030273102	0	0	Yes	No	No
121030273103	0	0	No	No	Yes
121030273104	0	0	No	No	No
121030273141	0	0	Yes	No	No
121030273142	0	0	No	No	No
121030273151	0	0	No	No	No
121030273152	1	0	No	No	No
121030273153	0	0	No	No	No
121030273154	2	0	No	Yes	No
121030273161	1	0	No	No	No
121030273162	2	0	No	No	No
121030273163	0	0	Yes	No	Yes

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030273171	0	0	No	No	No
121030273172	0	0	No	No	No
121030273173	0	0	No	No	Yes
121030273181	1	0	Yes	No	No
121030273182	0	0	No	No	No
121030273191	0	0	Yes	Yes	Yes
121030273192	0	0	No	No	No
121030273193	0	0	No	No	No
121030273201	2	1	No	Yes	No
121030273202	0	0	No	No	No
121030273203	0	1	No	No	No
121030273211	0	0	No	No	No
121030273221	0	0	No	No	No
121030273222	0	0	No	No	No
121030273223	0	0	No	No	No
121030273224	0	0	No	No	No
121030273231	0	0	No	No	No
121030273232	1	0	No	No	No
121030273241	0	0	No	No	No
121030273242	0	0	No	No	No
121030273243	0	0	No	Yes	No
121030273251	0	0	No	No	No
121030273252	0	0	No	No	No
121030273261	1	0	No	No	Yes
121030273262	0	0	Yes	No	Yes
121030273271	0	0	No	No	No
121030273272	3	0	Yes	No	Yes
121030274011	0	0	No	No	Yes
121030274012	0	0	No	No	No
121030274021	2	0	Yes	Yes	No
121030274022	1	0	Yes	No	No
121030274023	0	0	No	No	Yes
121030274024	0	0	No	No	Yes
121030274025	3	0	Yes	Yes	Yes
121030274031	1	0	No	No	No
121030275011	0	0	No	Yes	No
121030275012	0	0	No	No	No
121030275013	0	0	No	Yes	No
121030275014	0	0	No	No	No
121030275021	0	0	No	Yes	No
121030275022	2	1	No	Yes	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030275023	0	0	No	Yes	Yes
121030276031	0	0	No	Yes	No
121030276032	1	0	No	No	No
121030276033	0	2	No	Yes	No
121030276041	0	1	No	No	No
121030276042	0	5	No	No	Yes
121030276051	0	0	No	No	Yes
121030276061	3	2	No	No	No
121030276062	1	1	No	No	No
121030277011	2	0	No	No	No
121030277012	3	0	No	No	No
121030277031	6	3	No	No	No
121030277032	1	7	No	No	No
121030277041	1	0	No	No	No
121030277042	0	1	No	No	No
121030277043	1	0	No	No	No
121030277044	1	0	No	No	No
121030278011	2	3	No	No	No
121030278012	0	2	No	No	No
121030278021	2	4	No	No	Yes
121030278022	1	0	No	Yes	No
121030279011	1	5	No	No	No
121030279012	1	1	No	No	No
121030279013	0	1	No	No	Yes
121030279031	0	0	No	No	Yes
121030279041	0	0	No	No	No
121030279042	0	0	No	No	No
121030279043	0	0	No	No	No
121030280021	1	0	No	No	No
121030280022	1	0	No	No	No
121030280023	0	0	No	No	No
121030280024	0	0	No	Yes	No
121030280031	2	4	No	No	No
121030280032	0	0	No	Yes	No
121030280033	2	3	No	Yes	No
121030280034	2	3	No	No	No
121030280041	1	0	No	No	No
121030280042	2	0	No	No	No
121030281021	0	0	No	No	No
121030281022	1	0	No	Yes	No
121030281023	0	0	No	No	No

Block Group ID	Number of Shelters	Number of Benches	Minority Block Group	Low Income Block Group	LEP Block Group
121030281031	0	1	No	No	No
121030281032	6	2	No	Yes	No
121030281041	2	3	No	No	No
121030281042	1	1	No	No	No
121030281043	0	0	No	Yes	No
121030281044	0	0	No	No	No
121030282001	0	1	No	No	No
121030282002	0	0	No	No	No
121030282003	0	0	No	No	No
121030283001	1	1	Yes	Yes	Yes
121030283002	1	3	Yes	Yes	No
121030283003	1	6	No	No	No
121030283004	0	0	No	Yes	No
121030284011	2	2	No	No	Yes
121030284012	0	0	No	Yes	No
121030284021	1	8	No	No	No
121030284022	1	5	No	Yes	No
121030285001	0	4	No	Yes	No
121030285002	0	0	No	No	No
121030286001	7	3	Yes	Yes	No
121030286002	2	5	No	Yes	No
121030286003	4	1	No	No	No
121030287001	0	5	Yes	Yes	Yes
121030287002	5	4	Yes	Yes	No

APPENDIX E: TITLE VI COMPLAINT PROCEDURES AND FORM



PSTA TITLE VI PUBLIC NOTICE

PINELLAS SUNCOAST TRANSIT AUTHORITY OBJECTIVES/POLICY STATEMENTS (42 U.S.C. 2000d) TITLE VI OF THE CIVIL RIGHTS ACT TO ALL PSTA EMPLOYEES AND THE SERVICE COMMUNITY

As a major provider of public transportation whose employees have extensive daily contact with the public, the Pinellas Suncoast Transit Authority (PSTA) recognizes its responsibility to the community; it serves and is committed to a policy of nondiscrimination. PSTA works to ensure nondiscriminatory transportation in support of our mission to provide effective, coordinated and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Pinellas County citizens.

In compliance with Title VI of the Civil Rights Act of 1964, PSTA prohibits discrimination on the basis of race, color, age, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C Section 2000d)

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for PSTA to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information PSTA provides.

Environmental Justice Principles are:

- a) To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- b) To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process
- c) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations

Trish Collins, Director of Human Resources/EEO Officer, has been designated as PSTA's Civil Rights Officer, responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services and programs. In addition, Jacob Labutka is responsible for implementing all aspects of the Title VI Program. However, along with the Executive Director, all Directors, Managers, and their staff share in the responsibility for making PSTA's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by PSTA in its financial assistance agreement with DOT



To request a copy of this agency's Title VI program contact PSTA.

Any person who believes they have been discriminated against under

Title VI has the right to file a formal complaint within 180 days of the alleged

discrimination. Individuals and organizations may file a complaint with

Pinellas Suncoast Transit Authority by contacting PSTA or obtaining the complaint form from:

<https://www.psta.net/media/3676/title-vi-complaint-form.pdf>

The form should be completed, signed, and sent to:

Trish Collins, Director of Human Resources/EEO Officer

Pinellas Suncoast Transit Authority

3201 Scherer Drive

St. Petersburg, FL 33716

Fax: 727-540-1922

Individuals or organizations with questions, comments, or for more information may contact PSTA at the above address or email Title6Coordinator@psta.net.

Persons may also file a complaint with the Federal Transit Administrator's Office of Civil Rights by obtaining the complaint form from:

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Consolidated_Civil_Rights_Complaint_Form.pdf



**PINELLAS SUNCOAST TRANSIT AUTHORITY
TITLE VI OF THE CIVIL RIGHTS ACT
TO ALL PSTA EMPLOYEES AND THE SERVICE COMMUNITY**

As a major provider of public transportation whose employees have extensive daily contact with the public, the Pinellas Suncoast Transit Authority (PSTA) recognizes its responsibility to the community, which it serves and is committed to a policy of nondiscrimination. PSTA works to ensure nondiscriminatory transportation in support of our mission to provide effective, coordinated and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Pinellas County citizens. In compliance with Title VI of the Civil Rights Act of 1964 (Title VI), PSTA prohibits discrimination on the basis of race, color, and national origin in programs that receive federal funding.

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for PSTA, to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information PSTA provides.

Trish Collins, Director of Human Resources/EEO Officer, has been designated as PSTA's Civil Rights Officer responsible for civil rights compliance and monitoring to ensure nondiscriminatory provision of transit services and programs. In addition, Jacob Labutka is responsible for implementing all aspects of the Title VI Program. However, along with the Chief Executive Officer, All Directors, Managers, and their staff share in the responsibility for making PSTA's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by PSTA in its financial assistance agreements with DOT.

For more information contact:
Trish Collins or Jacob Labutka
Pinellas Suncoast Transit Authority
3201 Scherer Drive
St Petersburg, FL 33716
Title6Coordinator@psta.net
727-540-1800



PINELLAS SUNCOAST TRANSIT AUTHORITY TITLE VI COMPLAINT FORM

PSTA WORKS TO ENSURE NONDISCRIMINATORY TRANSPORTATION IN SUPPORT OF OUR MISSION TO PROVIDE EFFECTIVE, COORDINATED AND INTEGRATED MULTIMODAL TRANSPORTATION SOLUTIONS TO ENHANCE THE SOCIAL AND ECONOMIC QUALITY OF LIFE FOR ALL PINELLAS COUNTY CITIZENS. PSTA'S EEO OFFICER IS RESPONSIBLE FOR THE CIVIL RIGHTS COMPLAINT AND MONITORING TO ENSURE NONDISCRIMINATORY PROVISION OF TRANSIT SERVICES AND PROGRAMS.

THE ENVIRONMENTAL JUSTICE COMPONENT OF TITLE VI GUARANTEES FAIR TREATMENT FOR ALL PEOPLE AND PROVIDES FOR PSTA, TO IDENTIFY AND ADDRESS, AS APPROPRIATE, DISPROPORTIONATELY HIGH AND ADVERSE EFFECTS OF ITS PROGRAMS, POLICIES, AND ACTIVITIES ON MINORITY AND LOW INCOME POPULATIONS, SUCH AS UNDERTAKING REASONABLE STEPS TO ENSURE THAT LIMITED ENGLISH PROFICIENCY (LEP) PERSONS HAVE MEANINGFUL ACCESS TO THE PROGRAMS, SERVICES, AND INFORMATION PSTA PROVIDES.

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 PROHIBITS DISCRIMINATION ON THE BASIS OF RACE, COLOR, OR NATIONAL ORIGIN IN PROGRAMS AND ACTIVITIES RECEIVING FEDERAL FINANCIAL ASSISTANCE. SPECIFICALLY, TITLE VI PROVIDES THAT "NO PERSON IN THE UNITED STATES SHALL, ON THE GROUND OF RACE, COLOR, OR NATIONAL ORIGIN, BE EXCLUDED FROM PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE SUBJECTED TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE."

Section I:

Name:

Address:

Telephone (Home):

Telephone (Work):

Email Address:

Section II:

Are you filing this complaint on your own behalf? Check one:

_____ Yes (If yes, proceed to Section III) _____ No

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:



Please confirm that you have obtained permission from the aggrieved party if you are filing on behalf of a third part. Check one:

☐ Yes ☐ No

Section III:

I believe the discrimination I experience was based on (check all that apply):

☐ Race ☐ Color ☐ National Origin

Date of Alleged Discrimination (Month, Day, Year):

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV:

Have you previously filed a Title VI complaint with this agency? Check one:

☐ Yes ☐ No

Section V:

Have you filed this complaint with any Federal, State, or local agency, or with any Federal or State court? Check one:

☐ Yes ☐ No

If yes, provide agency and/or court and date of filing:

Signature

Date

Please submit this form in person at the address below, or mail or fax this form to:

Trish Collins, Director of Human Resources/EEO Officer
Pinellas Suncoast Transit Authority
3201 Scherer Drive
St. Petersburg, FL 33716
Fax: 727-540-1922



PINELLAS SUNCOAST TRANSIT AUTHORITY TÍTULO VI DE LA LEY DE DERECHOS CIVILES

A TODOS LOS EMPLEADOS DE PSTA Y SERVICIO COMUNITARIO

Como un importante proveedor de transporte público cuyos empleados tienen un amplio contacto diario con el público, Pinellas Suncoast Transit Authority (PSTA) reconoce su responsabilidad en la comunidad, a la que sirve y se ha comprometido a una política de no discriminación. PSTA trabaja para asegurar un transporte no discriminatorio en apoyo de nuestra misión para proveer soluciones de transporte multimodal efectivo, coordinado e integrado para mejorar la calidad de vida social y económica para todos los ciudadanos del Condado de Pinellas. En cumplimiento del Título VI de la Ley de Derechos Civiles de 1964 (Título VI) prohíbe la discriminación por motivos de raza, color y nacionalidad en programas que reciben financiamiento federal.

El componente de Justicia Ambiental del Título VI garantiza un trato justo para todas las personas y contempla a PSTA, para identificar y dirigir, según convenga, los efectos desproporcionadamente altos y adversos de sus programas, políticas y actividades en las poblaciones minoritarias y de bajos ingresos, tal como comprometerse a medidas razonables para garantizar que personas con Dominio Limitado del Inglés (LEP) tengan un acceso significativo a los programas, servicios e información que proporciona PSTA.

Trish Collins, El Director de Recursos Humanos y Igualdad de Oportunidades de Empleo (EEO), ha sido designada como oficial de Derechos Civiles de PSTA responsable del cumplimiento y supervisión de los derechos civiles para garantizar la prestación no discriminatoria de los servicios y programas de transporte. Adicionalmente, Jacob Labutka es responsable de implementar todos los aspectos del Programa del Título VI. Sin embargo, junto con el Director General, todos los Directores, Administradores, y su Personal comparten la responsabilidad de hacer del Programa del Título VI de PSTA todo un éxito. La implementación del Programa del Título VI tiene la misma prioridad que el cumplimiento con las otras obligaciones legales incurridas por PSTA en sus contratos de asistencia financiera con DOT.

Para mayor información contacte a:

Trish Collins o Jacob Labutka
Pinellas Suncoast Transit Authority
3201 Scherer Drive
St. Petersburg, FL 33716
Title6Coordinator@psta.net
727.540.1800



PINELLAS SUNCOAST TRANSIT AUTHORITY TITLE VI COMPLAINT FORM

EL TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964 PROHÍBE LA DISCRIMINACIÓN POR MOTIVOS DE RAZA, COLOR O NACIONALIDAD EN PROGRAMAS Y ACTIVIDADES QUE RECIBEN ASISTENCIA FINANCIERA FEDERAL. ESPECÍFICAMENTE, EL TÍTULO VI ESTABLECE QUE "NINGUNA PERSONA EN LOS ESTADOS UNIDOS DEBERÁ, POR MOTIVOS DE RAZA, COLOR, O NACIONALIDAD, SER EXCLUIDA DE PARTICIPAR EN, NEGÁRSELE LOS BENEFICIOS DE, O SOMETERSE A DISCRIMINACIÓN BAJO NINGÚN PROGRAMA O ACTIVIDAD QUE RECIBA ASISTENCIA FINANCIERA FEDERAL".

EL COMPONENTE DE JUSTICIA AMBIENTAL DEL TÍTULO VI GARANTIZA UN TRATO JUSTO PARA TODAS LAS PERSONAS Y CONTEMPLA A PSTA, PARA IDENTIFICAR Y DIRIGIR, SEGÚN CONVENGA, LOS EFECTOS DESPROPORCIONADAMENTE ALTOS Y ADVERSOS DE SUS PROGRAMAS, POLÍTICAS Y ACTIVIDADES EN LAS POBLACIONES MINORITARIAS Y DE BAJOS INGRESOS, TAL COMO COMPROMETERSE A MEDIDAS RAZONABLES PARA GARANTIZAR QUE PERSONAS CON DOMINIO LIMITADO DEL INGLÉS (LEP) TENGAN UN ACCESO SIGNIFICATIVO A LOS PROGRAMAS, SERVICIOS, E INFORMACIÓN QUE PROPORCIONA PSTA.

PSTA HACE LO POSIBLE PARA GARANTIZAR EL TRANSPORTE SIN DISCRIMINACIÓN A FIN DE CUMPLIR NUESTRA MISIÓN DE PROVEER UN SISTEMA DE TRANSPORTE MULTIMODAL EFECTIVO, COORDINADO E INTEGRADO QUE MEJORE LA CALIDAD DE VIDA SOCIAL Y ECONÓMICA DE LOS HABITANTES DEL CONDADO DE PINELLAS. EL OFICIAL DE IGUALDAD EN OPORTUNIDADES DE EMPLEO DE PSTA ES EL RESPONSABLE DEL CUMPLIMIENTO Y LA SUPERVISIÓN DE LOS DERECHOS CIVILES A FIN DE GARANTIZAR EL OFRECIMIENTO DE LOS SERVICIOS Y PROGRAMAS DE TRÁNSITO.

Sección I:

Nombre:

Dirección:

Teléfono (Casa):

Teléfono (Trabajo):

Dirección de Correo Electrónico:

Section II:

¿Usted mismo está presentando esta queja?

_____ Sí* (Si es así, vaya a la Sección III.) _____ No

Si no es así, proporcione el nombre y la relación de la persona por la que se queja:

Explique por qué se ha presentado a nombre de un tercero:



Confirme por favor que tiene el permiso de la persona agraviada si se está presentando a nombre de un tercero. _____ Si _____ No
Sección III:
Creo que la discriminación que experimenté fue por (marque todas las que apliquen): _____ Raza _____ Color _____ Nacionalidad
Date of Alleged Discrimination (Month, Day, Year):
Explique lo más claramente posible que pasó y por qué cree que fue discriminado. Describa a todas las personas que lo discriminaron (si las conoce), así como los nombres e información de contacto de cualquier testigo. Si requiere de más espacio, por favor use el reverso de este formulario.
Sección IV:
¿Había presentado antes una queja del Título VI a este organismo? _____ Si _____ No
Sección V:
¿Había presentado esta queja a algún organismo Federal, Estatal, o a algún tribunal Federal o Estatal? _____ Si _____ No
Si es así, proporcione el nombre del organismo y/o tribunal y la fecha de presentación:

Firma

Fecha

Presente este formulario en persona en la siguiente dirección, o envíe por correo o fax este formulario a:

Trish Collins, Director of Human Resources/EEO Officer
Pinellas Suncoast Transit Authority
3201 Scherer Drive
St. Petersburg, FL 33716
Fax: 727-540-1922

APPENDIX F: PSTA Rules and Regulations

RULES AND REGULATIONS PINELLAS SUNCOAST TRANSIT AUTHORITY

ARTICLE I. MISSION STATEMENT

Section 1.01 Mission Statement – PSTA provides safe, convenient, accessible and affordable public transportation services for Pinellas County residents and visitors, and supports economic vitality, thriving communities, and an enhanced quality of life.

ARTICLE II. BOARD OF DIRECTORS

Section 2.01 Board of Directors

A. Powers – All powers of PSTA as set forth in Chapter 2000- 424, Laws of Florida, as amended, shall be vested in the Board of Directors, except as otherwise provided by law or in these Rules and Regulations.

B. Duties – It shall be the duty of the Board of Directors to discharge the obligations and responsibilities imposed upon the Board by state law, federal law and these Rules and Regulations. The Board shall have the following duties:

1. The Board shall be responsible for evaluating the job performance of all employees that the Board has the direct authority to hire and fire. The evaluation process shall be determined by the Board as a whole, by a committee of the Board, by an independent management consultant, or any combination thereof.

2. The Board shall provide for an annual independent audit by a firm of certified public accountants of all PSTA accounts and may provide for more frequent audits if the Board deems it necessary. All audits shall be according to the procedures and requirements provided by law. The contract for audit services shall be the subject of competitive bidding at least every 5 years or as otherwise required by federal or state laws or regulations.

3. Except for the purpose of inquiries and investigations, the Board of Directors or its members individually shall deal with PSTA officers and employees who are subject to the direction and supervision of the Chief Executive Officer/Executive Director (“CEO/ED”) solely through the CEO/ED, and neither the Board nor its members shall give

orders to any such officer or employee either publicly or privately. It is the express intent of these Rules and Regulations that recommendations for improvement in PSTA operations by individual Board members be made to and through the CEO/ED. Nothing in this paragraph shall be construed to prohibit individual members of the Board from closely scrutinizing by questions and personal observations all aspects of PSTA operations so as to obtain independent information to assist the Board members in formulation of sound policy.

Section 2.02

Election and Terms – There shall be as officers of the Board of Directors, a Chairperson, Vice-Chairperson, and Secretary/Treasurer. Nomination of officers shall be made by a nominating committee of at least three board members appointed by the Board of Directors. The nominating committee shall submit all nominations no later than the December Board meeting each year, and the election shall be held immediately thereafter. The Board also shall accept nominations from individual Board members. A candidate receiving a majority vote of those Board members present and voting shall be declared elected. The term of office of each officer elected shall commence on January 1st of each year and last for one year or until their successors are elected. Vacancies in any office shall be filled by regular election procedure for the remaining term of the vacated office. An officer filling a partial term may be re-nominated for a full term in the same office.

Section 2.03

Compensation and Expenses – The members of the Board of Directors shall serve voluntarily and without compensation. Board members are entitled to receive their travel and other necessary expenses incurred in connection with PSTA business as provided in Chapter 2000-424, as amended, and Section 112.061, Fla. Stats.

Section 2.04

Duties of Officers

A. Chairperson – The Chairperson shall preside at all meetings and public hearings of the Board and shall have the duties normally conferred by parliamentary rules for such officers. The Chair shall have the authority to decide all points of order subject to the right of any Board member to appeal to the entire Board. However, the Chairperson shall have no voting power greater than any other Board member. The Chairperson shall be the official representative of PSTA and shall be authorized to sign contracts, deeds and other documents on behalf of PSTA, after approval of the Board of Directors.

B. Vice-Chairperson – The Vice-Chairperson shall act in the absence of the Chairperson.

C. Secretary/Treasurer – The Secretary/Treasurer shall attest all contracts, resolutions and other official PSTA documents. The secretary/treasurer is authorized to sign checks and other bank and financial documents on behalf of PSTA. In the absence of the Chairperson and Vice-Chairperson, the Secretary/Treasurer shall assume the duties of the Chairperson.

Section 2.05

Rules of Procedure of Board of Directors

A. Meetings – The Board of Directors shall normally meet regularly on the fourth Wednesday of each month at PSTA's Board Meeting Room or at any other location selected by the Board. The regular meetings normally will be held at 9:00 AM, except that one of the Board's regular meetings during each calendar year shall start at 6:00 PM. Special meetings and work sessions may be held on call of the Chairperson, the CEO/ED or any two Board members through the CEO/ED or General Counsel and, whenever possible, upon no less than twenty-four hours public notice. Work sessions are primarily designed for information gathering and guidance, and no formal Board decision approving or disapproving an item may be made. Only staff members, PSTA consultants or contractors, or representatives from other governmental agencies shall be included in the work session discussion unless prior arrangements are made through the CEO/ED, General Counsel or Chairperson. The Board, by majority vote, may allow comment from persons other than staff members on a specific work session item.

B. Agenda – The agenda at all regular meetings of the Board may include (except that public comment and Board member comment shall be included on all regular meeting agendas):

1. Call to Order and Pledge of Allegiance
2. Public Hearings
3. Awards and Recognition
4. Public Comment
5. Consent Agenda
6. Special Presentations
7. Action Items
8. Reports/Correspondence
9. Discussion Items
10. Board Member Comments

11. Adjournment

The Chairperson may deviate from the agenda upon request of any affected citizen, a public official, the CEO/ED or a Board member.

C. Agenda Preparation – The CEO/ED is responsible for preparing the agenda. The CEO/ED, General Counsel, Chairperson or any Board member may place an item on the regular agenda for action or discussion. The CEO/ED shall coordinate the agenda and shall attempt to have the agenda set and all materials mailed to or available electronically for the Board members, the Thursday prior to the meeting.

D. Consent Agenda – The consent agenda shall include items deemed by the CEO/ED to be non-controversial. The consent agenda shall not include the purchase of any item or the award of a bid for the purchase of any item where the item is not included in the present fiscal year budget. Prior to the approval of the items on the consent agenda, any item thereon may be withdrawn at the request of the Chairperson, any Board member, the CEO/ED or the General Counsel and moved to the regular agenda for discussion and disposition. The consent agenda items may be adopted individually or together in a single motion.

E. Public Comment

1. Public Comment. Public comment will be accepted on all Action Items and any other items on which the Board takes action, excluding ceremonial and ministerial items. The Chairperson will ask for public comment after PSTA staff has concluded its presentation. After public comment, the Chairperson shall receive comments, direction, or a motion from the Board of Directors. Public comment on items on the consent agenda, other than ceremonial and ministerial items, such as the approval of the Board's minutes, will be accepted under the Public Comment portion of the agenda.

2. Members of the public shall have the opportunity to comment on items relating to PSTA and which do not appear on the Agenda under the Public Comment section of the Agenda.

3. Each speaker who wishes to speak under Public Comment or in a Public Hearing under Section 2.10.E shall complete and present a public comment card to PSTA staff. The card will include the individual's name and address.

PSTA staff shall give the public comment cards to the Chairperson and speakers will be recognized in the order the comment cards are received by PSTA staff. The public comment cards may be presented to PSTA staff before or during the item. Speakers should wait to be recognized by the Chairperson. If speaking on an item referenced in Paragraph E.1 above, comments must be limited to the agenda item.

4. Each member of the public who addresses the Board under Public Comment, in a Public Hearing under Section 2.10.E, or on an agenda item shall be limited to three (3) minutes. A spokesperson may speak on behalf of a group; however, before presenting any item to the Board, the group shall first designate the spokesperson by completing the appropriate documentation. A spokesperson for a group may address the Board for three (3) minutes. However, for each member of the group present in the audience who waives their right to speak, the spokesperson will be given an additional three (3) minutes up to a maximum of ten (10) minutes. Each person addressing the Board shall approach the podium and give his/her name in an audible tone of voice. Each person shall not comment more than once on the same agenda item, at the same meeting, unless the Board grants an exception. All remarks should be addressed to the Board as a body, and not to any member thereof. All speakers, including Board members shall be recognized by the Chairperson. Any questions or comments of Board members in response to public comment shall be directed to the Chairperson or CEO. No questions shall be asked to individual Board members except through the Chairperson. Any person making personal, impertinent, or slanderous remarks, or who shall become boisterous while addressing the Board may be requested to leave the meeting and may be barred from further attendance at that meeting. The Chairperson shall preserve order at all meetings.

F. Motions and Voting

1. All motions shall be set forth in the affirmative. No motion shall be considered which states that the Board "not take action." Motions to "deny" or "table" an action are permitted. A motion to table an item, if passed, shall serve to defer the item indefinitely until the Board decides to reconsider the item. All motions shall require a second.

Motions and seconds may be withdrawn or amended with the approval of the proponents thereof.

2. Voting will typically be conducted by voice vote and recorded by individual "Aye" or "Nay." The Chairperson, in his/her discretion, may request a vote by roll call or show of hands. The results of every vote shall be reflected in the minutes, specifically identifying the Board members who are present at the time of the vote and those that vote "nay." In the event that there is a tie vote, the matter shall be considered an equipoise and shall be placed on the next regular meeting for reconsideration. The chairperson may not make a motion or second any motion.

3. Reconsideration – Any member of the Board who voted with the prevailing side may move to reconsider any action of the whole Board; provided that the motion be made at the same meeting at which the action was taken. A motion to reconsider shall be in order at any time during the meeting at which the action was taken, except when a motion on some other subject is pending. However, no motion to reconsider a vote on a public hearing item shall be entertained after the public hearing has been closed. No motion to reconsider shall be made more than once on any subject or matter at the same meeting. Board action may be rescinded by a majority vote.

4. Post-adoption Procedures – In the event a resolution is passed, such resolution will be signed by the Chairperson or presiding officer, attested to by the Secretary/Treasurer and approved as to form by the General Counsel.

Section 2.06

Minutes – The CEO/ED shall provide a secretary to the Board who shall prepare the minutes of all meetings for approval at the following regular session, whenever possible. The secretary shall note the attendance of the Board members in the minutes. The minutes shall not be read in full, but shall be approved in their entirety subject to corrections made by the Board. In the preparation of the minutes of any meeting, the secretary may, in the secretary's discretion, state the general topic of discussion rather than a summary of the comments of each speaker and each Board member. The minutes shall fully and thoroughly set forth the precise action taken by the Board, including the vote of each member of the Board. The CEO/ED is authorized to clarify the intent of any particular motion if such was reasonably contemplated.

Section 2.07

Attendance

A. Members of the Board shall notify the CEO/ED prior to the day of a scheduled meeting or at the time of polling by the staff's secretary if they are unable to attend. All other absences, excluding emergencies, will be counted as being unexcused.

B. If a regular Board member misses three regular Board meetings without being excused during a calendar year, he or she should be removed by the appointing authority. The chairperson shall contact the appointing authority recommending that such a member be removed and requesting that the vacancy be filled.

C. If a quorum of the Board of Directors or any committee is physically present at a meeting of the Board or committee, respectively, the Board or committee may allow an absent Board or committee member to participate by telephone or other interactive electronic technology, if circumstances are determined by the Board or committee, respectively, to be extraordinary. The telephone or other interactive electronic technology must be sufficient to allow the absent member to participate in discussions, to be heard by other Board or committee members and the public, and to hear discussions taking place during the meeting.

Section 2.08

Individual Opinions – Individual members of the Board must not represent their own views or recommendations as those of the Board unless the majority of the Board members have officially voted to approve such action. Board members making recommendations or expressing views not approved by a majority of the board shall indicate that such opinion is expressed as a private citizen.

Section 2.09

Committees

A. There is hereby established the Executive Committee of the Board of Directors. The Committee shall be composed of the Board's executive officers (Chairperson, Vice-Chairperson and Secretary/Treasurer), the immediate past Board Chairperson, and a Board member appointed by the Board. If a vacancy is created because the immediate past Board Chairperson is no longer a member of the Board, another Board member appointed by the Board shall fill the remainder of the term of the vacated position. The Executive Committee shall consist of five (5) members. The purpose of this committee generally is to deliberate and provide

direction on significant policy-level issues to the Board and CEO. The Executive Committee will support the decisions of the Board and will oversee and make recommendations on the Board Committees, and overall governance of the PSTA organization. It is not intended that the Executive Committee will make decisions on items that are to be decided by the Board as a whole, except as specifically authorized by the Board.

B. A Personnel Committee, made up of the Board Officers and two (2) additional Board members appointed by the Board, will conduct a performance review of the Agency's CEO/ED at the time provided for in the contract with the CEO/ED. Each Board member shall be provided an opportunity to offer their evaluation of the CEO/ED. All evaluations completed by Board members shall be considered by the Personnel Committee in conducting the CEO/ED's annual performance review and in making its recommendation to the Board for any salary adjustment. The Personnel Committee will also establish with the CEO/ED a set of mutually acceptable strategic plans for the next year. The Personnel Committee will develop an annual performance review and evaluation process based on the implementation of the Agency's agreed upon strategic direction, demonstrated evidence of leadership skills and attitude, and any other areas of performance as designated by the Personnel Committee.

C. There is hereby established the Finance and Performance Management Committee. The Finance and Performance Management Committee shall consist of five Board members, who shall be appointed as stated below. The duties of the Finance and Performance Management Committee are as follows: select audit firm, review audit report, review financial and operating reports, review and make recommendations on investment strategy, review and make recommendations on insurance policies, review proposed labor settlements and negotiations, review and make recommendations regarding major contracts and procurements, and oversee and monitor performance goals and measures.

D. There is hereby established the Legislative Committee. The Legislative Committee shall consist of five Board members. The duties of the Legislative Committee are as follows: recommend annual state and federal legislative agendas for Board approval, make recommendations regarding the selection of a lobbyist, interact with the lobbyist, and advise the full Board of the official positions of the local, state, and federal entities concerning

legislative matters pertaining to the operations, development, and funding of PSTA, including long-range capital and operating projects. The Legislative Committee will be given limited authority to establish PSTA positions on legislation and make positions known to state and federal elected officials as may be required by the schedule of legislative action and/or approvals, but any position must be confirmed with the full Board as soon as practical. All Legislative Committee correspondence or other communications with officials prior to full Board approval must be identified as on behalf of the Legislative Committee.

E. There is hereby established the Planning Committee. The Planning Committee shall consist of five Board members. The duties of the Planning Committee are as follows: strategic planning process oversight; review future business objectives and incentives; develop long-term funding strategies and develop annual budget goals/parameters.

F. The Board may establish other committees from time to time as it deems proper.

G. Nominations for positions or vacancies on any committee shall be made by the Nominating Committee, which will be submitted at the next Board meeting after the vacancy occurs. The Board also shall accept nominations from individual Board members. A candidate receiving a majority vote of those Board members present and voting shall be declared elected to the committee.

H. All appointments to the committees, excluding the Executive Committee, except for the initial appointments after the adoption of these Rules and Regulations, shall be for a term of two (2) years. The initial appointments after the adoption of these Rules and Regulations shall consist of two (2) appointments to each committee for a one (1) year term and three (3) appointments for a two (2) year term.

Section 2.10

Public Hearings.

A. Agenda – In all public hearings the following order may be followed, unless otherwise required by federal or state law or regulation:

1. Presentation by PSTA staff.
2. Questions by Board members.
3. Public comment.
4. Further comment by PSTA staff.
5. Comment and voting, when appropriate, by Board.

B. Notices – When a public hearing is scheduled, at least fifteen (15) days notice shall be provided, unless a different requirement is established by applicable state or federal law or regulation. The following notices may be provided:

1. Interior signs on all PSTA buses
2. Posters at Williams Park Transit Center, Park Street Transit Center, Grand Central Plaza, Pinellas Park Transit Center, and PSTA's Headquarters
3. On PSTA's website
4. Paid newspaper advertisement
5. Social Media

C. Number of Public Hearings

1. Fare increases and system-wide service changes shall require at least one public hearing that is easily accessible by bus, and includes adequate parking at a time that maximizes public attendance.
2. The Program of Projects and non-system-wide service changes that result in a 25% or more decrease of the transit route miles, transit revenue vehicle miles or estimated ridership of a transit route shall require at least one public hearing. If the non-system-wide service changes are such that a public hearing would be better held at a location central to the area affected by the changes, then this "central" hearing location may replace the PSTA headquarters hearing.
3. Budgets shall require at least two public hearings to be held in accordance with state statute. The locations for these hearings should be easily accessible by car and/or bus, where adequate parking exists, and at times as required by state statutes. There also shall be held two budget workshops which shall be held at dates, times, and locations approved by the Board of Directors.

D. Notice of Service Changes

Prior to implementation, the Board of Directors and passengers will be given adequate notice of any service change.

E. Conduct of Hearing.

1. Presentations will be limited to only the subject for which the public hearing is being held.

2. The public hearing will not be closed until all individuals, so desiring, have had an opportunity to make a presentation.

3. The regulations regarding public comment provided in Paragraphs 2.05 E.3 and 4 shall govern public comment in public hearings.

F. Public Hearings Conducted By PSTA Administration – On occasions, PSTA administration will hold public hearings on subjects that are not required Board public hearing subjects. These hearings will follow the same agenda and conduct as specified in Sections A and E.

Section 2.11

Use of Robert's Rules

The newest edition of Robert's Rules shall be used as a guideline for the meetings of the Board to the extent that Robert's Rules are not inconsistent with these Rules and Regulations.

ARTICLE III. CHIEF EXECUTIVE OFFICER/EXECUTIVE DIRECTOR

Section 3.01

CEO/ED – There shall be a CEO/ED to serve as the chief administrative officer and chief executive officer of PSTA. The CEO/ED shall be appointed by and serve at the pleasure of the Board of Directors.

Section 3.02

Powers and Duties of CEO/ED –The powers and duties of the CEO/ED shall include the following:

A. The CEO/ED may employ such employees as may be necessary for the proper administration of the duties and functions of PSTA, and may determine the qualifications of such persons; however, the Board must approve the number of such positions and fix the budget for the compensation for employees. When he/she deems it necessary for the good of PSTA, he/she may demote, suspend or remove any PSTA employee or appointed administrative officer under the CEO/ED's jurisdiction, except as otherwise provided by law. Such action shall be in compliance with all applicable rules and regulations of PSTA.

B. Direct and supervise the administration of all departments, offices and agencies of PSTA except as otherwise provided for herein.

- C. Attend Board meetings and shall have the right to take part in discussion but may not vote. See that all laws, rules and regulations and acts of the Board which are subject to enforcement by the CEO/ED are faithfully executed.
- D. Prepare and submit the annual operating budget and capital improvement budget to the Board of Directors.
- E. Prepare and submit an annual capital program and all applications for federal and state grants.
- F. Recommend changes to the fare structure and recommend changes to PSTA's service.
- G. Sign contracts, deeds and other documents on behalf of PSTA pursuant to the provisions of these Rules and Regulations or as authorized by the Board of Directors.
- H. Develop and keep current a policy manual which shall set forth the policies adopted by the Board of Directors.
- I. Provide such administrative assistance to the Board in connection with their official duties, and perform such other duties as are specified in these Rules and Regulations or may be required by the Board.
- J. The CEO/ED shall designate a department director or other managerial employee who shall exercise the powers and perform the duties of the CEO/ED during the CEO/ED's temporary absence or disability. The CEO/ED shall notify the Board, electronically, who he/she has designated.
- K. At any time during the fiscal year the CEO/ED may transfer part or all of any unencumbered appropriation balance within a department to any other department. For any transfer that exceeds one-hundred thousand (\$100,000.00) dollars, such transfer must first be approved by the Board of Directors.

ARTICLE IV. GENERAL COUNSEL

Section 4.01

General Counsel – The General Counsel shall be appointed by and serve under the direct supervision of the Board of Directors. The General Counsel shall act as the legal advisor to the Board of Directors, the CEO/ED and all PSTA offices and agencies. The General Counsel shall defend on behalf of PSTA all complaints, suits and controversies in which PSTA is a party. The General Counsel shall prosecute on behalf of PSTA all complaints, suits and controversies when authorized by the CEO/ED. The General Counsel shall prepare or review and approve as to form all

contracts, grant applications and other instruments to which PSTA is a party, as requested by the CEO/ED. The General Counsel shall perform such other duties as may be directed by the Board of Directors.

ARTICLE V. PURCHASING

Section 5.01

Competitive Bidding

A. Procurement of Commodities and/or Services – Except as otherwise provided in these Rules and Regulations, the procurement of commodities and/or services of an estimated value in excess of \$100,000.00 shall be by written contract or Purchase Order with the most responsible and responsive bidder/proposer, whose bid has been solicited, received, and approved by the Board of Directors. All competitive bidding shall be conducted in accordance with PSTA's procurement procedures and all federal or state rules or regulations that apply to the respective procurement, which shall be prepared and approved by the CEO/ED or his/her designee. The procurements of commodities and/or services of an estimated value below \$100,000.00 shall be approved by the CEO/ED or designee and shall be made in accordance with the procurement procedures. The CEO/ED shall include in his/her report that is part of each Board's agenda a list of all procurements with an estimated value greater than \$25,000 and less than \$100,000 that the CEO/ED has approved. The CEO/ED shall have authority to settle legal claims, including workers' compensation claims, whether the settlement is reached pre-litigation or during litigation, where the amount paid or received by PSTA is less than \$25,000.00. If any purchase over \$100,000 is approved by the CEO/ED because an emergency situation prevents the ability to follow the provisions of these Rules, the Board of Directors shall be promptly notified of such purchase and the basis for such purchase. For purposes of this section, "emergency situation" means a situation which threatens the overall operations of PSTA.

B. Lobbying – Lobbying of any PSTA Board member, officer, evaluation committee member, employee, agent or attorney by a bidder, any member of the bidder's staff, any agent or representative of the bidder, whether compensated or not, or any person employed by any legal entity affiliated with or representing the bidder shall be prohibited on all competitive selection processes and contract awards, including but not limited to requests for proposals, requests for quotations, requests for qualification, invitation for bids, bids or the award of purchasing contracts of any type. Lobbying is strictly prohibited from the date of the

advertisement or on a date otherwise established by the Pinellas Suncoast Transit Authority Board of Directors, until either an award is final, any protest is finally resolved, or the competitive selection process is otherwise concluded. The purposes of this prohibition is to protect the integrity of the procurement process by shielding it from undue influences prior to the contract award, a protest is resolved, or the competitive selection process is otherwise concluded. Nothing herein shall prohibit a bidder from contacting the purchasing division or PSTA's general counsel to address situations such as clarification and/or questions related to the procurement process or protest. The Pinellas Suncoast Transit Authority Board of Directors, when the award of the bid is within the Board of Directors' authority, shall deem any bidder who violates the provisions of this Paragraph non-responsible and non-responsive, and the bidder's proposal or bid shall not be considered by the evaluation committee or the Board of Directors. When an award of bid is within the CEO/ED's authority, the CEO/ED shall deem any bidder who violates the provisions of this Paragraph non-responsible and non-responsive and the bidder's proposal or bid shall not be considered by the CEO/ED.

For the purposes of this Paragraph, lobbying shall mean influencing or attempting to influence action or non-action, and/or attempting to obtain the goodwill of persons specified herein relating to the selection, ranking, or contract award in connection with the bidding process through direct or indirect oral or written communication. Lobbying includes such actions whether performed by the bidder itself, any employee of the bidder, the bidder's attorney, agent or other paid or non-paid representative, or any person who performs such actions on behalf or at the behest of the bidder. Further, lobbying includes the attempt to influence Board members while they are performing their functions for other governmental entities (e.g. a city or Pinellas County). The final award of the contract shall be the effective date of the contract.

Section 5.02

A. Procurement through other government contracts – PSTA shall be permitted to procure commodities and/or services from Pinellas County contracts, State of Florida contracts, or other governmental contracts that are competitively bid in compliance with applicable state or federal regulations and/or PSTA's procurement procedures. The Board of Directors will approve any such procurement in excess of \$100,000.00.

B. Fuel Procurement –

1. Because of the volatility of fuel markets, the procurement of fuel may be conducted without following the requirements of Section 5.01. If the CEO/ED chooses to purchase fuel without following the requirements of Section 5.01, the CEO/ED shall request authority from the Board of Directors each year to enter into agreements to purchase and deliver fuel through NYMEX futures contracts and/or fuel daily OPIS contracts in an amount not to exceed the total amount budgeted for fuel.
2. The CEO/ED may enter into agreements to purchase diesel fuel for the ensuing fiscal year up to six months prior to the final adoption of the budget for the ensuing fiscal year on the following conditions:
 - a. the CEO/ED does not obligate PSTA to the purchase of more than ten million dollars (\$10,000,000) of diesel fuel before the final adoption of the budget for the ensuing fiscal year; and
 - b. there shall be no actual expenditures for diesel fuel until PSTA receives delivery of the fuel after the final adoption of the budget.

Section 5.03

Bid Protest Procedures – Non-Federal Transit Administration Grant

A. Right to Protest – Any interested party, who wishes to protest a PSTA decision or intended decision concerning a bid or a contract award, shall file a written Notice of Protest with the CEO/ED of PSTA within seventy-two hours after the posting of the bid tabulation or after the issuance of the notice of PSTA's decision or intended decision and shall file a formal written protest within ten days after the date of the Notice of Protest. The formal written protest shall state with particularity the basis of the protest, including the facts and law upon which the protest is based, and providing any supporting documentation. Failure to file a Notice of Protest or failure to file a formal written protest within the time periods set forth above shall constitute a waiver of protest.

B. Providing a Bond – Any firm or person who files a protest shall file with PSTA, at the time of filing the formal written protest, a bond payable to PSTA in an amount equal to one percent of the estimate of the total value of the contract or \$5,000, whichever is less. Such bond shall be conditioned upon payment of all costs

which may be adjusted against the protestor upon the conclusion of the protest proceedings. If the protest determination is not in favor of the protester, PSTA shall recover all costs, damages and charges incurred by it during the protest, excluding attorneys' fees. Upon payment of such costs and charges by the person or firm protesting the decision or intended decision, the bond shall be returned.

C. Consideration of Protest – PSTA's CEO/ED will consider all protests of a PSTA decision or intended decision concerning a bid solicitation or a contract award where the protestor has complied with the requirements of subsections A and B of this Article. When the CEO/ED is a member of the committee that makes a recommendation or intended decision, the CEO/ED shall designate a Department Director to consider the protest. The CEO/ED or his/her designee shall not consider any protest presented orally or not presented within the time limits set forth in subsection A. The CEO/ED or his/her designee shall provide the protestor and all other bidders with a written determination of the protest within fifteen (15) days of receiving the formal written protest. The CEO/ED's or his/her designee's decision is final. The CEO/ED or his/her designee may provide an opportunity to resolve the protest by mutual agreement between the parties within seven days, excluding Saturdays, Sundays and legal holidays, of PSTA's receipt of the formal written protest.

D. Stay of Procurement During Protests – There shall be no stay of the bid process or the procurement during protests.

E. Notice to Bidders – Bid tabulations with recommendations will be posted on a bulletin board maintained at PSTA's principal place of business for purposes of posting bid tabulations. Upon receipt of a formal written protest, PSTA will give notice of the protest to all bidders, or if the bid already was awarded at the time the protest was filed with PSTA, only to the successful bidder. When a protest results in a delay of an award of the contract pending the disposition of the protest, the bidder or bidders whose bids might become eligible for award will be requested, before expiration of the time for acceptance of their bids (with consent of sureties, if any) to extend the time for acceptance so as to avoid the need for re-advertisement and re-bidding.

Section 5.04

Bid Protest Procedures – Federal Transit Administration Grant

A. Right to Protest – Any interested party, as defined by FTA Circular 4220.1F, Chapter VII, as it may be amended from time to time, who wishes to protest a PSTA decision or intended decision

concerning a bid or a contract award, shall file a written Notice of Protest with the CEO/ED of PSTA within seventy-two hours after the posting of the bid tabulation or after the issuance of the notice of PSTA's decision or intended decision and shall file a formal written protest within ten days after the date of the Notice of Protest. The formal written protest shall state with particularity the basis of the protest, including the facts and law upon which the protest is based and providing any supporting documentation. Failure to file a Notice of Protest of failure to file a formal written protest within the time periods set forth above shall constitute a waiver of protest.

B. Providing a Bond – Any firm or person who files a protest shall file with PSTA, at the time of filing the formal written protest, a bond payable to PSTA in an amount equal to one percent of the estimate of the total value of the contract or \$5,000, whichever is less. Such bond shall be conditioned upon payment of all costs which may be adjusted against the protestor upon the conclusion of the protest proceedings. If the protest determination is not in favor of the protester, PSTA shall recover all costs, damages and charges incurred by it during the protest, excluding attorneys' fees. Upon payment of such costs and charges by the person or firm protesting the decision or intended decision, the bond shall be returned.

C. Consideration of Protest – PSTA's CEO/ED will consider all protests of a PSTA decision or intended decision concerning a bid solicitation or a contract award where the protestor has complied with the requirements of subsections A and B of this Article. When the CEO/ED is a member of the committee that makes a recommendation or intended decision, the CEO/ED shall designate a Department Director to consider the protest. The CEO/ED or his/her designee shall not consider any protest presented orally or not presented within the time limits set forth in subsection A. The CEO/ED or his/her designee shall provide the protestor and all other bidders with a written determination of the protest within fifteen (15) days of receiving the formal written protest. The CEO/ED or his/her designee may provide an opportunity to resolve the protest by mutual agreement between the parties within seven days, excluding Saturdays, Sundays and legal holidays, of PSTA's receipt of the formal written protest.

D. Protest to FTA – Any protester whose protest has been denied by PSTA's CEO/ED or his/her designee may file a protest with FTA within five days of the date the protestor has received actual or constructive notice of the CEO/ED's or his/her designee's

decision. The protester must comply with FTA's procedures and FTA Circular 4220.1F, Chapter VII. PSTA's CEO/ED or his/her designee shall submit any reports or documents requested by FTA in its consideration of the protest.

E. Stay of Procurement During Protests – When a protest has been timely filed with PSTA or timely filed with FTA, during the pendency of that protest, PSTA shall not make an award of a contract. PSTA shall comply with all provisions of Chapter VII, if it proceeds to make an award during the pendency of a protest filed with FTA. If PSTA does not make an award while a protest is pending with PSTA, after five days from the date the CEO/ED or his/her designee rendered his decision, the CEO/ED or his/her designee shall confirm with FTA that FTA has not received a protest on the contract in question before PSTA proceeds with making an award or with the procurement if an award already had been made.

F. Notice to Bidders – Bid with recommendations will be posted on a bulletin board maintained at PSTA's principal place of business for purposes of posting bid tabulations. Upon receipt of a formal written protest, PSTA will give notice of the protest to all bidders, or if the bid already was awarded at the time the protest was filed with PSTA, only to the successful bidder. When a protest results in a delay of an award of the contract pending the disposition of the protest, the bidder or bidders whose bids might become eligible for award will be requested, before expiration of the time for acceptance of their bids (with consent of sureties, if any) to extend the time for acceptance so as to avoid the need for re-advertisement and re-bidding.

Section 5.05

The CEO/ED shall develop and implement a Disadvantaged Business Enterprise program and should take affirmative action through advertising and using any other means to encourage disadvantaged business enterprises within and outside of Pinellas County to participate fully in DBE programs and in all aspects of procurement.

ARTICLE VI. CODE OF ETHICS

Section 6.01

It is hereby declared to be the policy of PSTA that no officer or employee of this agency shall have any interest, financial or otherwise, direct or indirect; engage in any business transaction or professional activity; or incur any obligation of any nature which is in substantial conflict with the proper discharge of his duties in the public interest. To implement this policy and to comply with the

terms and conditions of contractual requirements with FTA, a Code of Ethics is adopted as follows:

A. No employee, officer, agent or board member, or his or her immediate family member, partner or organization that employs or is about to employ any of the foregoing may participate in the selection, award or administration of a contract supported with FTA assistance if a conflict, real or apparent, would be involved. Such a conflict would arise when any of the parties set forth below has a financial or other interest in the firm selected for award:

1. The employee, officer or agent;
2. Any member of his or her immediate family;
3. His or her partner; or
4. An organization that employs, or is to employ, any of the above.

B. No employee, officer agent or board members of PSTA shall either solicit or accept gifts, gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to any sub-agreement.

C. Violation of any of the above provisions shall, pursuant to applicable constitutional or statutory procedures, constitute grounds for, and may be punished by, one or more of the following:

1. In the case of a Board member:
 - a. Removal from office.
 - b. Suspension from office.
 - c. Public censure and reprimand.
 - d. Restitution of any pecuniary benefits received because of the violation committed.
2. In the case of an employee or agent:
 - a. Dismissal from employment.
 - b. Suspension from employment for not more than ninety days without pay.
 - c. Demotion.
 - d. Reduction in salary level.
 - e. Restitution of any pecuniary benefits received because of the violation committed.
3. In the case of a contractor or their agents:
 - a. Contract can be voided by PSTA.

ARTICLE VII. INDEMNIFICATION

Section 7.01

Except as otherwise provided herein, any member of the Board, any appointive officer, or any employee of PSTA, who is sued and/or suffers or sustains damage by any judgment obtained against him or her in a court of proper jurisdiction, or suffers or sustains pecuniary expense or damages against him or her personally as the result of litigation involving any action or omission done or omitted to be done by him or her as such public official, Board member or employee of PSTA, PSTA will do or cause to be done the following things:

- A. Defend such person in the lawsuit by an attorney or attorneys selected by the Board or its insurer for this purpose, obtain and present such available evidence as would be necessary or proper and reasonably procurable under the circumstances for the proper defense of such person in such action, and pay the necessary court costs in and incident to such lawsuit.
- B. Pay or settle any judgment or damages against such person obtained as the proximate result of such lawsuit.
- C. Reimburse such person for any personal expense he has reasonably and necessarily sustained in such litigation and judgment.
- D. Do whatever else is necessary or proper, in the sole discretion of the Board, to protect the Board member, officer, or employee under the facts and circumstances of the particular case.

Section 7.02

This protection and reimbursement only shall cover situations where the Board member, officer or employee of PSTA has been determined to have been failing to act or to have acted negligently or carelessly as the Board member, officer, or employee of PSTA within the scope of duties or responsibilities of his particular office or employment.

Section 7.03

There shall be no protection, indemnification or reimbursement in the following situations:

- A. If the Board member, officer, or employee of PSTA has been guilty of intentional misconduct or of intentional omission of duty or where it is determined that he acted in bad faith, with malicious purpose, in a manner exhibiting wanton and willful disregard of human or civil rights, safety, or property, or disregarded clearly established constitutional or statutory rights.
- B. For any such Board member, officer, or employee of PSTA for criminal charges where there is a finding of guilt.

C. For any such Board member, officer, or employee of PSTA for punitive or exemplary damage awards.

D. For any act or omission that was taken outside the scope of employment or duties of the office of the Board member, officer, or employee.

Section 7.04

The provisions of this Article shall apply to all actions and proceedings pending upon or instituted after the effective date of these provisions. As used herein, an action shall be construed to be pending where the action has not been tried, or if tried where the judgment has not become final by reason of the completion of any appellate proceedings.

Section 7.05

The duty to defend or indemnify as prescribed by these articles shall be conditioned upon (1) delivery to the CEO/ED of PSTA by the Board member, officer, or employee the original or a copy of any summons, complaint, process, notice, demand or pleading within five (5) days after the Board member, officer, or employee is served with same; and (2) the full cooperation of the Board member, officer, or employee in the defense of such action or proceeding and in defense of any action or proceeding against PSTA based upon the same act or omission and in the prosecution of any appeal.

Section 7.06

Unless the context otherwise requires, the term "employee" shall mean any person holding or that did hold a position by election, appointment or employment in the service of PSTA, or a volunteer appointed to a PSTA-sponsored board, but shall not include an independent contractor or volunteer. The term "employee" shall include a former employee or his estate or judicially appointed personal representative.

Section 7.07

PSTA may undertake the defense of its Board members, officers and employees as indicated in this Article, but reserves its right to seek indemnification and/or recovery for any judgment or settlement paid, all court costs incurred and all attorney's fees incurred in the defense of the Board member, officer, or employee where it is determined that said Board member, officer, or employee acted or failed to act because of fraud, corruption, malice; where it is determined that said Board member, officer, or employee acted in bad faith, with malicious purpose, in a manner exhibiting wanton and willful disregard of human or civil rights, safety or property or disregarded clearly established constitutional or statutory rights; or where the Board member, officer, or

employee fails to cooperate in good faith in the defense of the claim.

Section 7.08

All Board members, officers, and employees shall be represented by PSTA's general counsel or an attorney selected by PSTA's insurer, if any, provided, however, any such Board member, officer, or employee may be represented by private counsel selected by PSTA where PSTA determines that representation by PSTA's general counsel would be inappropriate or that a conflict of interest exists requiring private counsel. Reasonable attorney's fees and litigation expenses shall be paid by PSTA to such private counsel from time to time during the pendency of the civil action or proceeding.

Section 7.09

The provisions of this Article shall not be construed to impair, alter, limit or modify the rights and obligations of any insurer or insured under any policy of insurance.

Section 7.10

Nothing herein shall be construed as a waiver by PSTA of its authority to settle any claim by or against PSTA at any time. PSTA retains the right to settle any claim against any Board member, officer, or employee for which PSTA will defend and indemnify the Board member, officer, or employee under this Article, at any time.

Section 7.11

Nothing herein shall be construed as a waiver by PSTA or any Board member, officer or employee of any claim of immunity, including sovereign immunity, applicable to any action.

ARTICLE VIII. AMENDMENTS TO RULES AND REGULATIONS

Section 8.01

These rules and regulations may be amended from time to time by resolution adopted by the Board of Directors.

ARTICLE IX. BOARD OF DIRECTORS RECOGNITION PROGRAM

Members of the PSTA Board of Directors will be presented with an award upon leaving the Board of Directors in accordance with the following policy:

1. An award will be presented to any Board member who has completed at least one year of his/her term of office, and is in good standing according to the rules set by the Board of Directors in regard to attendance at regular Board meetings.
2. A plaque will be awarded. The plaque is to be purchased at a cost not to exceed \$50.00.
3. A lifetime pass allowing the member to use public transit services operated directly by PSTA for free will be awarded.

Revised: 1/27/16

APPENDIX G: PSTA Board Approval

APPENDIX H: Service Equity Analyses & Fare Policy

Title VI Overview

As a major provider of public transportation whose employees have extensive daily contact with the public, PSTA recognizes its responsibility to the community it serves and is committed to a policy of nondiscrimination. PSTA works to ensure non-discriminatory transportation in support of its mission to provide effective, coordinated, and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Pinellas County citizens.

In compliance with Title VI of the Civil Rights Act of 1964, PSTA prohibits discrimination on the basis of race, color, or national origin in its programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance” (42 U.S.C. § 2000d).

PSTA Major Service Change Policy

PSTA conducts a Title VI analysis on all Major Service Changes. PSTA defines a Major Service Change as any modification that results in a **25 percent or more decrease of the transit route miles, transit revenue vehicle miles or estimated ridership of a transit route**. When any change exceeds the established threshold, PSTA will proceed with posting the appropriate public notices and conducting public hearings in compliance with the Public Participation Plan detailed previously in this Title VI Program Update. Equity analyses were also conducted for service changes that affected 25% or more of the transit route miles, transit vehicle miles or estimated ridership even if the changes did not result in a decrease in service.

The adverse effect will be measured by the change between the existing and proposed service levels that would be deemed significant. Additions to service may also result in disparate impacts if the addition is at the expense of reductions to other routes.

Disparate Impact Policy

Disparate impacts will be examined both when a Major Service Change is undertaken and/or a fare change is implemented. PSTA defines a disparate impact as any time there is a difference in impacts between minority and total populations of **plus or minus ten percent that negatively impacts the minority population**. For example, if the minority population makes up 30 percent of the overall population, but would bear 45 percent of the adverse impacts, there may be a disparate impact since the minority group bears 15 percent more than its expected share. The Disparate Impact Policy will be applied uniformly to all modes of service operated by PSTA.

Disproportionate Burden Policy

The Disproportionate Burden Policy applies to adverse effects on low-income populations as a result of Major Service Changes and all fare changes. PSTA defines a disproportionate burden as any time there is a difference in impacts between low-income and total populations of **plus or minus ten percent that negatively impacts the low-income population**. For example, if the low-income population makes up 30 percent of the overall population, but would bear 45 percent of the impacts, there may be a disproportionate impact since the low-income group bears 15 percent more than its expected share. The Disproportionate Burden Policy will be applied uniformly to all modes of service operated by PSTA.

Methodology

PSTA utilizes the transit planning software Remix to conduct Title VI analyses. Remix includes an analytic tool specifically designed for Title VI. The tool compares geographic and demographic coverage of a transit network between two booking periods. Below is the description Remix provides regarding their data sources and methodology:

1. Get the population near a route, including its low income and minority percentage.

- For each route, build a shape that represents the area within quarter mile of any of its stops.
- Intersect the catchment area with 2013-2017 ACS Census data. Get a list of block groups and the percentage overlap with each.
- For each block group, take the percentage of overlap and multiply it by the block group's statistics.
- Get the population, minority population, and low-income population for each group and sum them together. This is the total population a route could serve.

2. Compare the number of people-trips, before and after.

- Multiply the population near a route times the number of trips it makes (per year) to get "people-trips".
- Repeat for low-income and minority populations to get "low income people-trips" and "minority people trips".
- Compare these numbers between the before and after versions of the route, to get a set of people-trip differences. We match before and after using routes that have the same name.

3. Get the total difference in people-trips across the transit system.

- Repeat the process above for every route in the transit system.

- Sum together the difference in people trips. This will return three numbers: total difference in people-trips, total difference in low-income people-trips, and total difference in minority people trips.

4. Calculate the change borne by low-income and minority populations.

- Divide the total difference in low-income people trips by the total difference in people-trips to get the percentage of change borne by those with low incomes.
- Repeat for minority people-trips.

5. Compare the percentage change to the average in the service area.

- Calculate the average percentage of low-income and minority populations across the entire service area.
- Subtract from the change borne by those populations.
- Get two final numbers: the delta between the impact this set of transit changes had on low income and minority populations compared to any average change.
- The changes borne by low income and minority populations are calculated and analyzed for all variants in a route. The figures shown in this report are from the main variant of each route. An example of the reporting methodology is shown below.

The following is a list of data sources Remix utilizes to compute its figures:

- Census data is provided by the US American Community Survey, 2013-2017.
- Population is coded by table B03002, field B03002001.
- Low income status is set at 100%. This is coded by the appropriate fields in table C17002.
- Minority status is coded by table B03002, by subtracting the white, non-Hispanic population (B03002003) from the total population (B03002001).
- Service area is a set of block groups determined by a shapefile your agency provides.
- Map and routing data is provided OpenStreetMap, Mapbox, and Valhalla.

Remix Service Equity Analysis Spreadsheet Export Example

(Feb 2018 Service Change)

Route	Before (Inbound)				Before (Outbound)			
	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)
Rt 58 A - Main Variant	18,156	13.3%	22.0%	1,020	19,771	13.5%	21.1%	1,020
Rt 58 B	16,583	13.9%	21.2%	765	18,447	13.9%	20.4%	765
Rt 58 C	9,892	13.5%	18.1%	255	0			0
Rt 58 D	0			0	10,401	13.2%	17.0%	255
Rt 58 E	0			0	19,753	13.5%	21.1%	255
Rt 59	15,513	17.2%	23.0%	13,350	15,402	17.7%	23.5%	13,385
Rt 74	16,495	18.5%	25.7%	10,500	15,888	18.7%	26.1%	10,500
Rt 444 A - Main Variant	12,206	15.7%	24.3%	510	9,061	15.9%	26.7%	765
Rt 444 B	5,893	13.3%	19.9%	510	8,886	19.0%	27.8%	510
Rt 444 C	11,272	15.9%	25.0%	255	0			0
All Changes (both directions)	558,482	16.6%	29.6%	54,620				

Route	After (Inbound)				After (Outbound)			
	Population (within 1/4 mi)	Low Income	Minority	(Annually)	Population (within 1/4 mi)	Low Income	Minority	(Annually)
Rt 58 A - Main Variant	18,156	13.3%	22.0%	1,530	18,447	13.9%	20.4%	1,530
Rt 58 B	16,583	13.9%	21.2%	1,530	19,771	13.5%	21.1%	1,275
Rt 58 C	0			0	19,753	13.5%	21.1%	510
Rt 58 D	0			0	10,401	13.2%	17.0%	255
Rt 58 E	0			0	0			0
Rt 59	15,513	17.2%	23.0%	16,155	15,402	17.7%	23.5%	16,190
Rt 74	16,495	18.5%	25.7%	12,030	15,907	18.7%	26.1%	12,540
Rt 444 A - Main Variant	0			0	0			0
Rt 444 B	0			0	0			0
Rt 444 C	0			0	0			0
All Changes (both directions)	550,674	16.7%	29.7%	63,545				

Route	Difference				
	People-Trips (Population * Trips)	Low Income People-Trips	Minority People- Trips	Change Borne By Low Income	Change Borne by Minorities
Rt 58 A - Main Variant	17,317,050	2,446,921	3,550,620	14.1%	20.5%
Rt 58 B	23,782,065	3,193,676	5,121,930	13.4%	21.5%
Rt 58 C	7,551,570	1,017,079	1,669,230	13.5%	22.1%
Rt 58 D	0	0	0	0.0%	0.0%
Rt 58 E	-5,037,015	-678,234	-1,062,840	13.5%	21.1%
Rt 59	86,716,575	15,138,782	20,170,755	17.5%	23.3%
Rt 74	57,887,130	10,749,659	14,959,110	18.6%	25.8%
Rt 444 A - Main Variant	-13,156,725	-2,080,979	-3,365,235	15.8%	25.6%
Rt 444 B	-7,537,290	-1,260,183	-1,857,930	16.7%	24.6%
Rt 444 C	-2,874,360	-457,225	-718,335	15.9%	25.0%
All Changes (both directions)	164,649,000	28,069,495	38,467,305	17.0%	23.4%

Feb 2018 Service Change Analysis

In the February 2018 service change, four routes that exceeded the service change threshold experienced schedule adjustments or were removed from service. As shown in Table 1, no routes exceeded the ten percent margin for disparate impact or disproportionate income. The changes borne by low income and minority residents were within ten percent of the county averages. Figure 1 displays the routes impacted by the Feb 2018 service change.

- **Route 58:** The overall span of service was increased. Several evening trips were added to the Route 58 schedule.
- **Route 59:** The daytime frequency was increased to 15 minutes to match the Route 4 at the 34th St Transfer Center.
- **Route 74:** The daytime frequency was increased to 20 minutes to match the service that was previously provided along this corridor before this route was split previously.
- **Route 444:** This route was removed from service. Route 444 was a weekday service that operated every 120 minutes. Less than 3,000 riders utilized the service in FY17 (approx. 1 pax per revenue hour).

A public hearing was held Tuesday, Nov. 28, 2017 at the Pinellas Park Library.

Table 1: Low Income/Minority population exceeding service change threshold

Route	Change Borne By Low Income	Change Borne By Minority
58	14.1%	20.5%
59	17.5%	23.3%
74	18.6%	25.8%
444	15.8%	25.6%
County Average	14.1%	24.7%

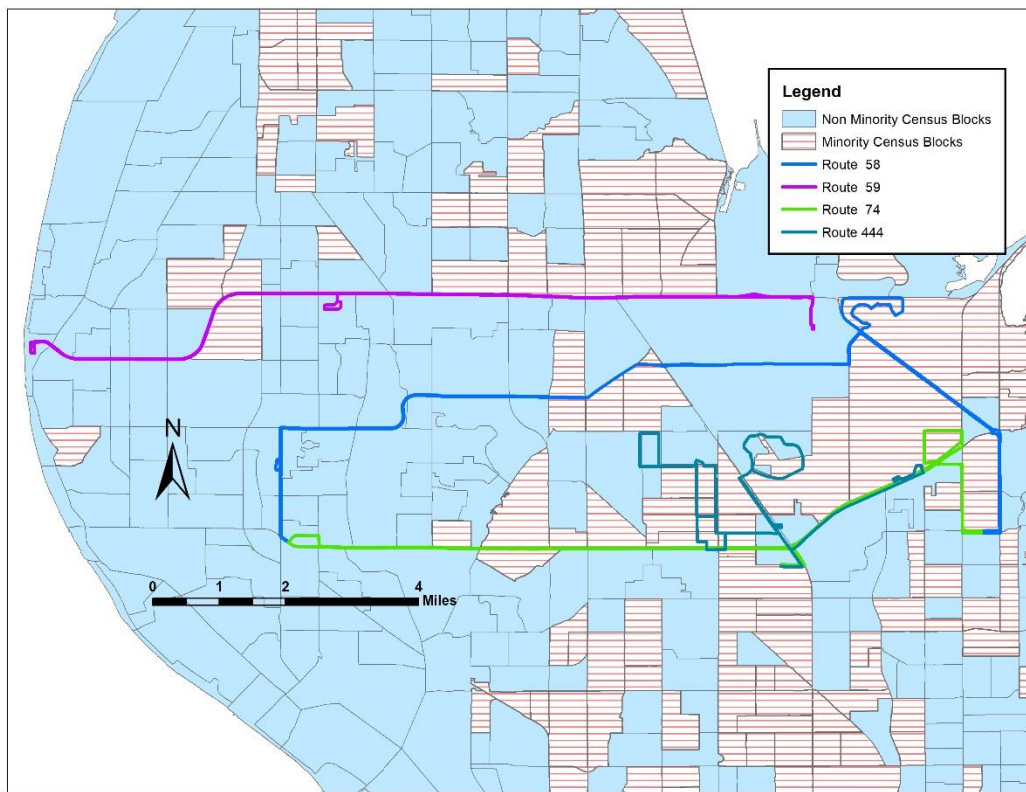
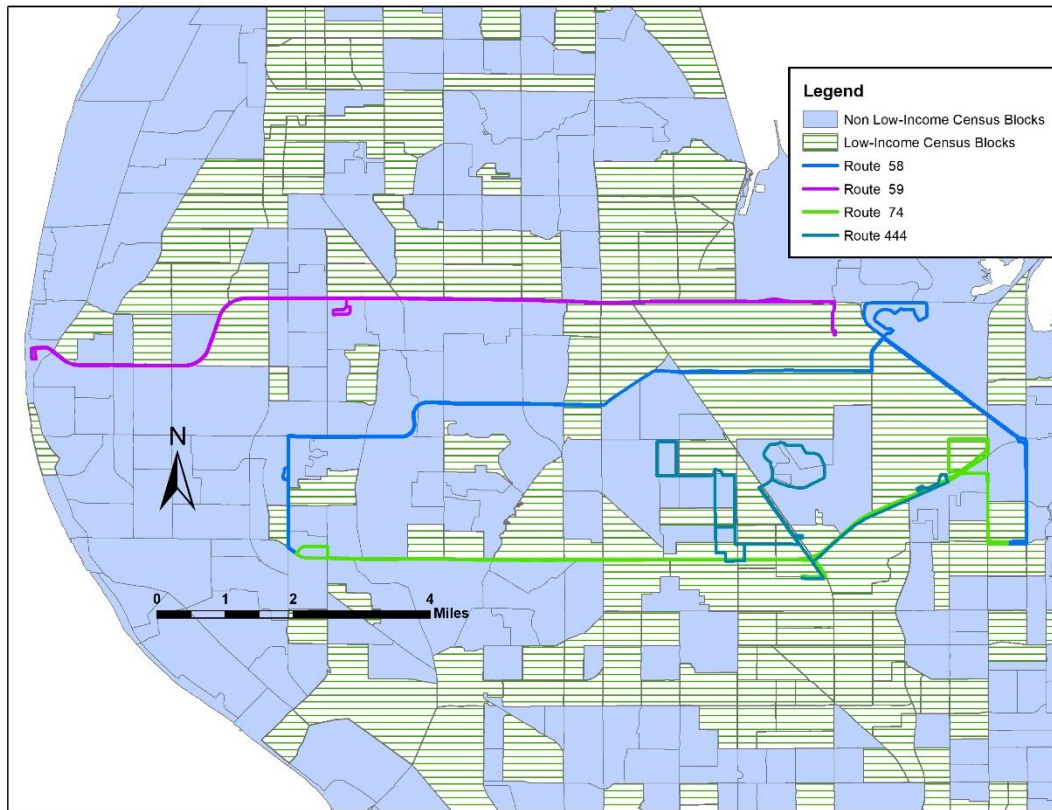
Figure 1A: Feb '18 Service Change Routes – Low-Income Census Blocks

Figure 1B: Feb '18 Service Change Routes – Minority Census Blocks

June 2018 Service Change Analysis

Table 2: Low Income/Minority population exceeding service change threshold

Route	Change Borne by Low Income	Change Borne by Minorities
100X	13.2%	27.0%
County Average	14.1%	24.7%

In the June 2018 service change, one route exceeded the service change threshold. Route 100X was extended from Gateway Mall to Downtown St. Petersburg to provide a one seat ride from this neighborhood to Downtown Tampa. The extended service operates on a similar schedule to the previous service. As shown in Table 2, the expansion of this routes neither created a disproportionate burden or disparate impact within the ten percent margin. The changes borne by low income and minority residents were within ten percent of the county averages. Figure 2 displays Route 100X before the service change (the figure also shows the other express route, Route 300X, that provides service to Tampa).

Figure 2A: June '18 Service Change Routes – Low-Income Census Blocks

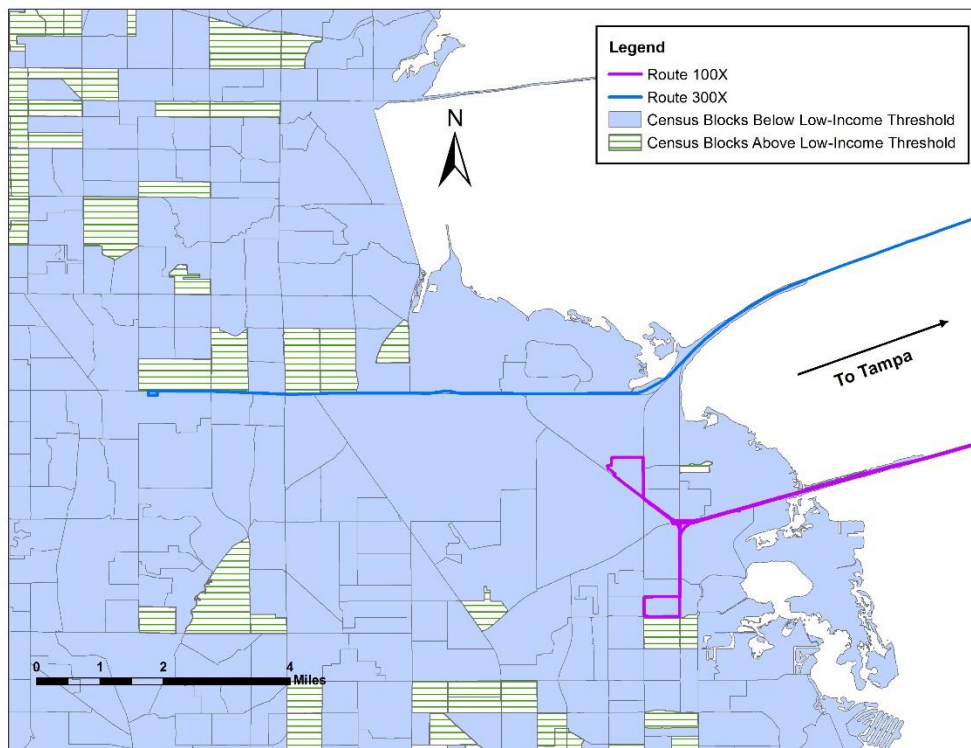
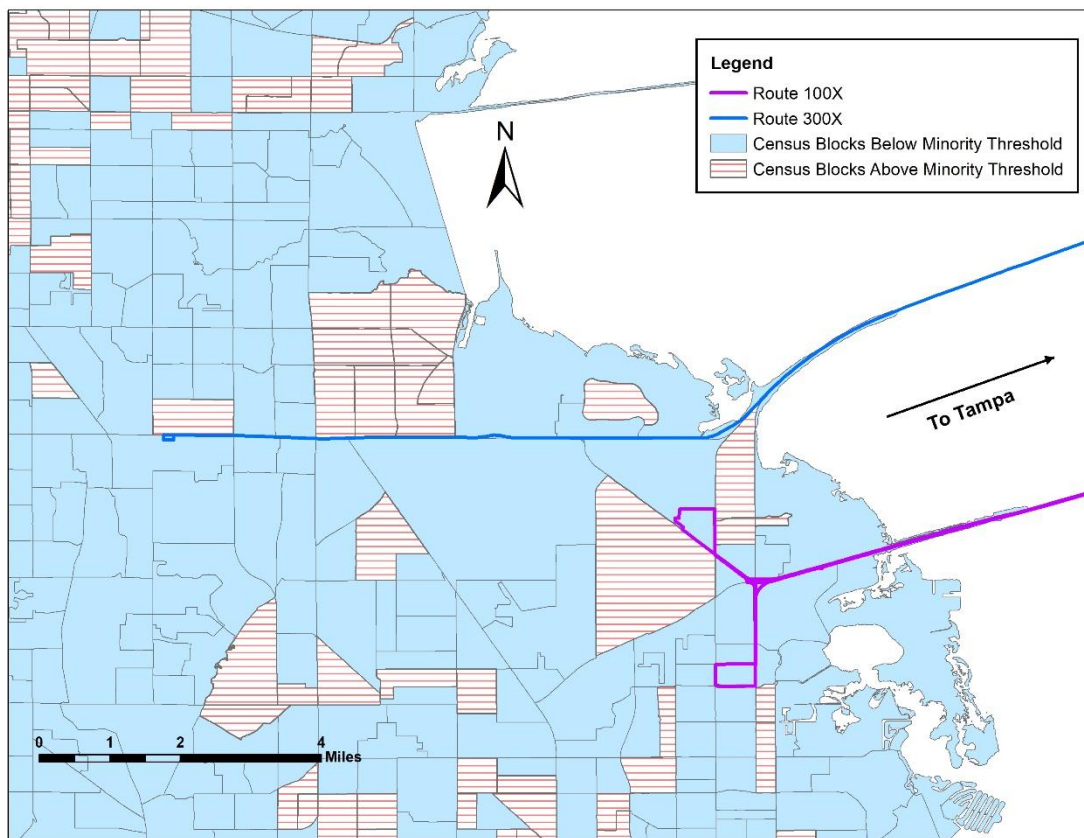


Figure 2B: June '18 Service Change Routes – Minority Census Blocks

October 2018 Service Change Analysis

In the October 2018 service change, two routes exceeded the service change threshold. Routes 97 and 98 were removed from service and folded into a single limited stop service that operates along the alignment of those routes: Route 52 LX. The Route 52LX service operates a similar span of service to the peak hour routes (Routes 97 & 98) that it replaced. As shown in Table 3, the removal of Routes 97 and 98 neither created a disproportionate burden or disparate impact within the ten percent margin. Figure 3 displays the routes impacted by the June 2018 service change.

Table 3: Low Income/Minority population exceeding service change threshold

Route	Change Borne by Low Income	Change Borne by Minority
97	18.2%	33.2%
98	18.3%	31.6%
52	17.8%	31.7%
County Average	14.1%	24.7%

A public hearing was held Tuesday, Aug. 14, 2018 at the PSTA Headquarters.

Figure 3A: Oct '18 Service Change Routes – Low-Income Census Blocks

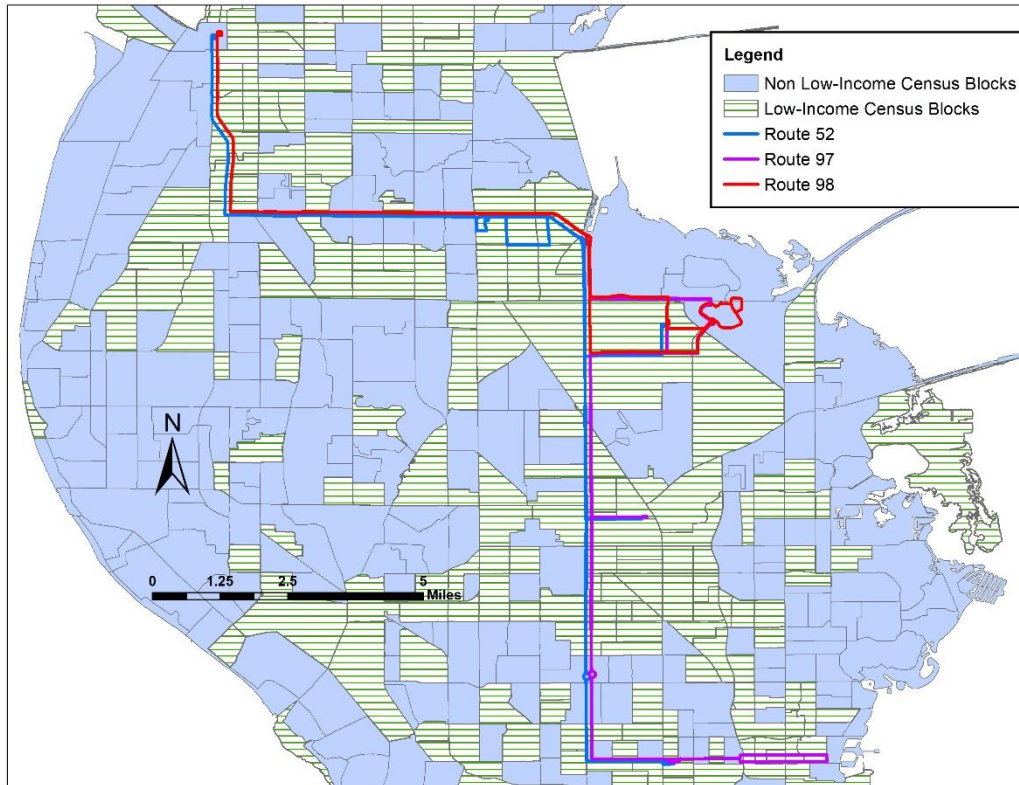
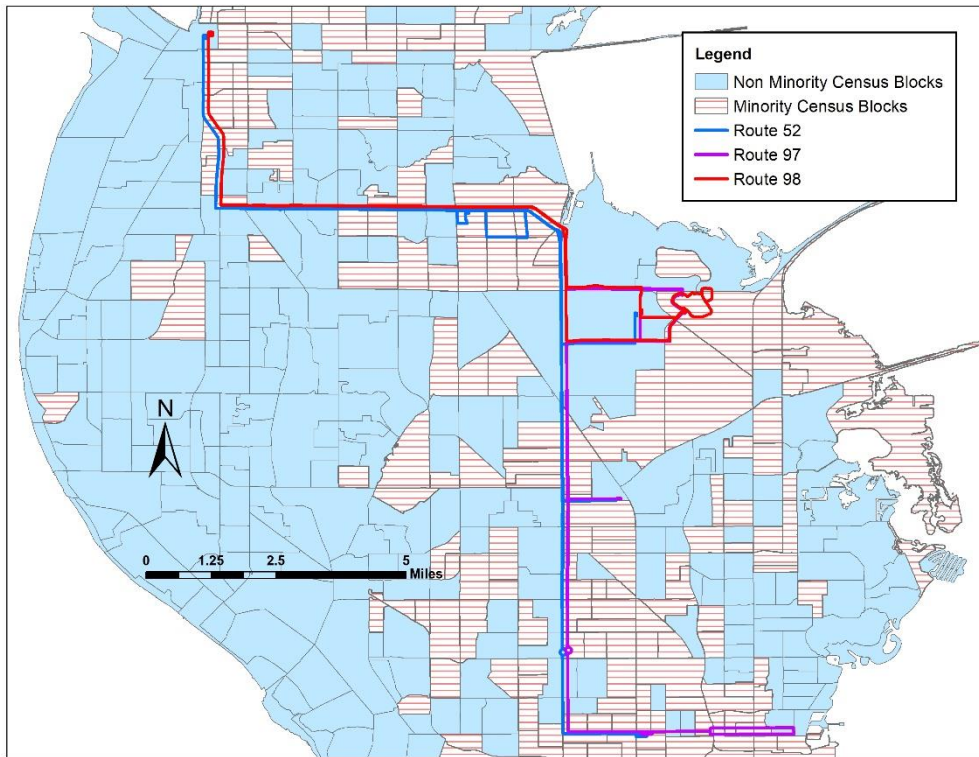


Figure 3B: Oct '18 Service Change Routes – Minority Census Blocks



October 2019 Service Change Analysis

In the February 2018 service change, two routes exceeded the service change threshold due to scheduling and routing adjustments. As shown in Table 4, no routes exceeded the ten percent margin for disproportionate burden. Changes to the route 5 did slightly exceed the disparate impact threshold. However, there were no net reductions in service along Route 5 that created an adverse impact for riders. Figure 4 displays the routes impacted by the October 2019 service change.

Route 5 now ends at Grand Central Station, which was the central transfer point of the former Route 5. The eastern segment of Route 5 is now served by the Route 9. Headways were lowered from 30 minutes peak/60 minutes off peak during the weekdays to 30 minutes all day. As a result of this service change, this segment of the route received a net increase in service, which will provide the higher concentrations of low-income and minority riders that live in this area additional trip options throughout the day.

Table 4: Low Income/Minority population exceeding service change threshold

Route	Change Borne by Low Income	Change Borne by Minorities
5	25.5%	31.2%
9	22.8%	33.5%
County Average	14.1%	24.7%

Figure 4A: Oct '19 Service Change Routes – Low-Income Census Blocks

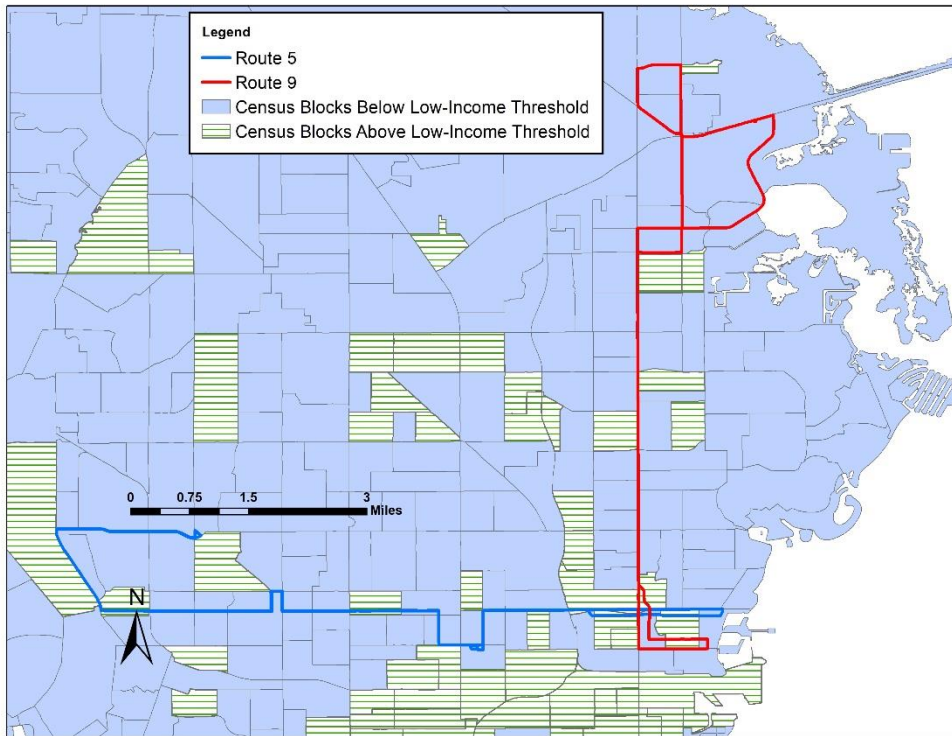
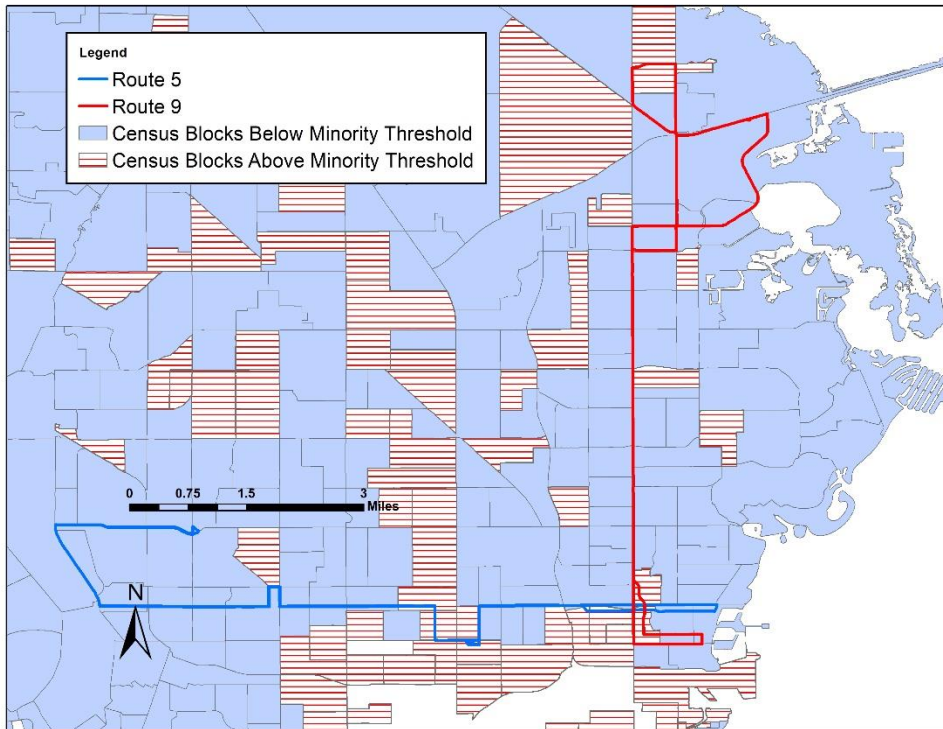


Figure 4B: Oct '19 Service Change Routes – Minority Census Blocks



March 2020 Service Change Analysis

Table 5: Changes Borne by Low-Income and Minority Populations along Affected Routes

Route	Low-Income Population within 1/4 mile	Minority population within 1/4 mile
4	16.9%	40.6%
9	17.5%	28.1%
14	25.9%	57.7%
18	17.5%	28.6%
19	14.1%	23.6%
22	10.6%	22.4%
23	20.1%	49.6%
32	30.3%	36.5%
34	21.6%	40.9%
38	14.4%	23.5%
52	18.1%	32.6%
58	13.4%	21.6%
59	15.8%	24.0%
60	19.7%	44.4%
61	17.6%	30.7%
62	12.7%	23.1%
65	13.2%	14.6%
66	18.3%	29.2%
67	11.4%	27.6%
73	15.6%	22.8%
74	17.0%	29.6%
76	15.6%	35.1%
78	21.7%	36.3%
79	19.3%	38.1%
100X	17.2%	30.6%
300X	22.0%	33.3%
52LX	17.0%	30.2%
Central Ave Trolley	15.9%	29.9%
Looper	15.1%	24.5%
JT South Beach	14.9%	10.0%
812	14.3%	38.3%
813	11.2%	13.9%
814	6.7%	17.4%
1/4 mile from all Affected Routes	16.1%	29.9%
Pinellas County	13.7%	25.3%

Source: Remix, American Community Survey 5-Year Data (2014 – 2018)

In the temporary service change that began on March 29, 2020 that was developed in response to the COVID-19 pandemic, the majority of the PSTA system (33 routes) experienced schedule adjustments that exceed the 25% major service change threshold. The following major service changes occurred:

- All fixed route service to end by 10pm, including paratransit.
- PSTA Weekday service operating on a Saturday schedule.
- PSTA Weekend service operating on a Sunday schedule.
- Additional service (plugs) available for higher ridership routes to limit passenger loads.
- No service on 52LX only (52 still available), 58, 66L, 100X, 300X.
- No weekend service on Routes 22, 32, 62, 67, 73, 76, 812, 813, 814.
- Looper service in Downtown St Petersburg temporarily discontinued
- Jolley Trolley South Beach Route temporarily discontinued (served by Suncoast Beach Trolley)

Table 1 shows all affected routes and the minority and low-income population percentages within $\frac{1}{4}$ mile of the routes. Figures are highlighted that are plus or minus ten percent from the average of Pinellas County. This indicates a disproportionate burden (low-income) or disparate impact (minority). Two routes (Route 14, 32) exceed the disproportionate burden threshold and 13 routes (Route 4, 14, 23, 32, 34, 60, 65, 78, 79, Jolley Trolley South Beach, 812, 813, 814) exceed the disparate impact threshold.

Table 1 also shows the collective impact of the major service change on low-income and minority residents, which is not within ten percent of the low-income or minority population of Pinellas County. Therefore, the major service changes collectively do not create a disproportionate burden or disparate impact.

Disparate Impact (Minority Population)

If PSTA enacts a major service change that creates a disparate impact for any routes, the agency must meet a legal test. Cumulatively, the major service change does not create a disparate impact. There is a disparate impact for 12 of the 33 routes that experienced a major service change.

The legal test is met if the transit provider has a substantial legitimate justification for the proposed service change, and the transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals. Given the need for PSTA to

respond to COVID-19, the agency has a substantial legitimate justification for the proposed service change. There are no alternatives to this that would accomplish the goal of responding to COVID-19.

The decision to reduce service across the system was based on:

- Decline in overall system ridership that has occurred since the week of March 15, 2020
- Redistribution of vehicles to continue high ridership routes
- The need to lower driver exposure to general public
- Anticipation of driver absenteeism due to illness or need to care for children

Disproportionate Burden (Low-Income Population)

If PSTA enacts a service change that creates a disproportionate burden, then PSTA must take steps to avoid, minimize, or mitigate impacts where practicable. PSTA must describe alternatives available to low-income populations affected by the service change. Cumulatively, the service change does not create a disproportionate burden. There is a disproportionate burden for 2 of the 33 routes that experienced a major service change.

To mitigate the effects of this service change for low-income riders, PSTA has made all routes fare-free during the duration of the COVID-19 outbreak. This is to allow riders to board and alight using the rear door to encourage social distancing and reduce the cost of transportation for essential employees or those seeking work at an essential employer during this time.

PSTA also expanded the hours of its Transportation Disadvantaged (TD) Late Shift program, which provides rides to or from work for low-income residents outside of fixed-route service hours for \$9 a month. The service changed to begin one hour earlier at 9PM in response to all transit services ceasing operations by 10pm.

TD participants can also utilize TD Direct Connect, a first/last mile program that provides rides to and from 26 bus stop locations in Pinellas County. This service operates from 5am to midnight and has a greater subsidy than the Direct Connect program that is available to all riders. TD Direct Connect riders receive \$9 off Uber and United taxi trips and \$34 off wheelchair trips. Riders are eligible for TD programs if their household income is 150% of the federal poverty level or less.

January 2020 Fare Equity Analysis – Flamingo Fares¹⁷

¹⁷ As of November 2020, this new fare structure has not yet been implemented.

In accordance with its Title VI Policy, PSTA conducts an equity analysis for any fare changes. This involves determining if proposed fare changes create a disparate impact for minority riders or disproportionate burden for low-income riders. PSTA defines a disparate impact or disproportionate burden as a greater potential negative impact to minority or low-income populations as compared to the total population riding.

As shown in the table below, there is no disparate impact or disproportionate burden created by changes in any fare type. For example, 3% of all minority riders and 2% of all low-income riders use the 7-Day pass, while 2% of all riders use the 7-Day pass. Since the difference between the minority and low-income utilization and the overall utilization of all riders is less than ten percent, no disparate impact or disproportionate burden is expected.

Furthermore, fare types that are being removed (3-Day & 7-Day passes) will have little impact on riders given their low rates of utilization. The express cash fare rate is being reduced to the same price as the regular cash fare, which will benefit riders who take regional express routes (100X & 300X). In addition, the new fare capping policy that will be implemented with Flamingo Fares will more equitable for riders unable to pay the upfront price of daily and monthly passes.

See tables below for a breakdown of the fare change and its impact on minority and low-income riders.

Table 6: Fare Equity Analysis

% of Total		Cost		Change	
Fare Type	Fare Description	Existing	Proposed Fare	Absolute	Percentage
Cash	Regular Cash Fare	\$2.25	\$2.25	\$0.00	0%
	Reduced Cash Fare	\$1.10	\$1.10	\$0.00	0%
	Regular Express Cash Fare	\$3.00	\$2.25	-\$0.75	-33%
	Reduced Express Cash Fare	\$1.50	\$1.10	-\$0.40	-36%
Daily	1-Day GO Card	\$5.00	\$5.00	\$0.00	0%
	Reduced 1-Day GO Card	\$2.50	\$2.50	\$0.00	0%
3-Day	3-Day Unlimited*	\$10.00	Removed	N/A	N/A
	3-Day Unlimited Reduced	\$5.00	Removed	N/A	N/A
7-Day	7-Day Unlimited	\$25.00	Removed	N/A	N/A
	7-Day Unlimited Reduced	\$12.50	Removed	N/A	N/A
10-Day	10-Day Transportation Disadvantaged	\$10.00	\$10.00	\$0.00	0%
Monthly	31-Day GO Card	\$70.00	\$70.00	\$0.00	0%
	31-Day Reduced	\$35.00	\$35.00	\$0.00	0%
	31-Day Transportation Disadvantaged	\$11.00	\$11.00	\$0.00	0%
Passport	Passport Monthly	\$85.00	\$85.00	\$0.00	0%
Flamingo	3-Day Unlimited Ride	\$18.00	Removed	N/A	N/A
	7-Day Unlimited Ride	\$25.00	Removed	N/A	N/A

*Data Source: PSTA 2017 On-Board Survey conducted by the Florida Department of Transportation

Fare Type	Fare Description	Minority	Low-Income	All Riders
Cash	Regular Cash Fare	26%	25%	29%
	Reduced Cash Fare			
	Regular Express Cash Fare			
	Reduced Express Cash Fare			
Daily	1-Day GO Card	14%	14%	17%
	Reduced 1-Day GO Card			
3-Day	3-Day Unlimited*	1%	1%	1%
	3-Day Unlimited Reduced			
7-Day	7-Day Unlimited	3%	2%	2%
	7-Day Unlimited Reduced			
10-Day	10-Day Transportation Disadvantaged	2%	2%	2%
Monthly	31-Day GO Card	35%	38%	33%
	31-Day Reduced			
	31-Day Transportation Disadvantaged			
Passport	Passport Monthly	8%	7%	7%
Flamingo	3-Day Unlimited Ride	1%	1%	1%
	7-Day Unlimited Ride			

Fare Policy

July 11, 2014
PSTA FARE POLICY

FARE POLICY GUIDELINES

The goal of this Fare Policy is to support PSTA's mission of providing high-quality public transportation services for the benefit of the individuals and communities that it serves.

FARE POLICY PURPOSE

The purpose of the Fare Policy is to establish guidelines for setting or restructuring PSTA fares. PSTA staff, Transit Riders Advisory Committee, and Board of Directors will refer to this policy when making decisions regarding PSTA's fare pricing and products. Such decisions will also be made in accordance with Federal Transit Administration (FTA), Americans with Disabilities Act (ADA), and State of Florida requirements in addition to PSTA's enabling legislation, which directs PSTA to adopt a fare policy that addresses:

- a fare structure, including fare media and passes;
- pricing levels, including discounts;
- a system for free or substantially price-reduced fares, and;
- fare equity.

PSTA will review its fare policy and pricing annually, with the expectation that fares may need to be adjusted more frequently due to increased Authority costs, changing market conditions, or other situations that will impact the Fare Policy Objectives.

FARE POLICY OBJECTIVES

PSTA's fare policy objectives reflect the complexity of developing a fare structure which balances the desire to keep fares affordable for PSTA customers with the need to maximize fare revenue to help maintain and expand transit operations. When changes to the fare structure are considered, strategies for meeting the below objectives will be developed and evaluated. Any new fare structure will encompass the mix of strategies that are determined to best meet the Fare Policy Objectives, as described below, in the context of the conditions and needs at that time:

1. Promote Transit Utilization and Occupancy

Because PSTA exists to provide transit services for the benefit of the public, the degree to which PSTA increases ridership is a direct indication of how successfully PSTA is achieving its mission. However, when an increase in ridership creates the need to add service, the resulting additional fare revenue is offset by new operating costs. It is therefore important to adopt fare strategies that will increase ridership on services that have underutilized passenger capacity. It is also important to adopt fare strategies that promote usage and make PSTA services attractive, simple, and convenient to use.

2. Establish Equitable Fares (Title VI)

To be equitable, fares must take into account the needs of various populations of users and types of services. The fare structure should, therefore, support the travel patterns and requirements of transit riders throughout the service area and should reflect the level and quality of the service provided. The fare structure should be clear and equitable. PSTA

recognizes the need to ensure that for any fare increase, the share of the burden placed on Title VI communities is not disproportionately greater than that borne by the system as a whole.

3. Optimize Fare Revenue Stream

Because fare revenue is a critical component of PSTA's operating budget, any increase to, or restructuring of fares should ensure that the total fare revenue stream is maintained at an appropriate and predictable level within changing economic conditions. To accomplish this, PSTA will assess all transit services periodically.

Fares will also be reviewed annually considering inflation. Fare decisions will also be based on PSTA's Financial Plan assumptions, Board rules and regulations, and Board determination.

PSTA increased fares in October 2015. The fare changes are detailed in Attachment I.

PSTA will also stay abreast of the latest developments in fare collection technologies to maximize and improve revenue collection as appropriate and feasible, including the elimination of fraudulent transactions.

4. Improve Customer Satisfaction, Mobility & Access

The fare structure should enhance the ability of riders to access the system and move through it with ease. Fare options should be convenient, easy to understand, and reward frequent usage.

The fare structure should promote a unified system by simplifying fares across modes.

5. Improve Operations

PSTA's fare policy should strive to improve system performance. This will be accomplished by making fare payment simpler, easier, and faster, resulting in reduced boarding times.

6. Respect Customer Privacy

As PSTA strives to implement fare collection technologies that are easy and convenient to use, the Authority recognizes the need to respect customers' privacy and ensure the security of personal information.

FARE POLICY CHANGES

PSTA'S fare policy will be changed and amended as needed due to future developments in fare collection.

PUBLIC ENGAGEMENT

PSTA will ensure numerous public engagement opportunities in the decision-making process for fare policy changes and development

Rules and Regulations-Pinellas Suncoast Transit Authority with Regards to Fare Increases

Public Hearings:

Fare increases shall require at least three public hearings: one in north county, one in mid-county, and one in south county. The locations for the hearings should be easily accessible by bus and include adequate parking at a time that maximizes public attendance.

Notices:

When a public hearing is scheduled, at least fifteen (15) days' notice shall be provided, unless a different requirement is established by applicable state or federal law or regulation. The following notices may be provided: 1. Interior signs on all PSTA buses; 2. Posters at Williams Park, Park Street Transit Center, Grand Central Plaza Transit Center, Pinellas Park Transit Center, and PSTA's Headquarters; 3. On PSTA's website; 4. Paid newspaper advertisement; and 5. Social Media.

FUTURE STRATEGIES

PSTA is presently working on a regional upgrade for fare collection. In partnership with HART, PSTA launched a mobile ticketing app, Flamingo. In the near year, PSTA will implement smart card technology on its entire fleet.

Advancements in fare collection systems may encourage the consolidation of fare products (analyzed in the January 2020 Fare Equity Analysis), while providing an adequate range of fare products.

PSTA FARE PROGRAMS

See the following attachments for PSTA fare programs:

- Attachment A: Passenger Fare Summary
- Attachment B: Senior/Disabled Bus Fares
- Attachment C: East Lake Service
- Attachment D: Demand Response Program
- Attachment E: Transportation Disadvantaged Program
- Attachment F: Medicaid Program
- Attachment G: Bulk Ticket Sales
- Attachment H: Universal Pass Program (UPASS) (Contracted)

ATTACHMENT A: PASSENGER FARE SUMMARY

FARE CATEGORIES	Fares
REGULAR ROUTES¹⁸ (Includes North County Connector service, PSTA Trolley services, and Jolley Trolley.)	
Child (5 years and younger)	Free
Full Cash Fare (one trip)	\$2.25
Special Citizen Reduced Cash Fare	\$1.10
Student Reduced Cash Fare	\$1.10
One Trip Ticket (1 each one-way trip)	\$2.25
Daily Full Fare Unlimited Ride GO Card	\$5.00
Daily Reduced Fare Unlimited Ride GO Card	\$2.50
3-Day Unlimited GO Card & Flamingo Fare	\$10.00
3-Day Unlimited Reduced GO Card	\$5.00
7-Day Unlimited Ride GO Card & Flamingo Fare	\$25.00
7-Day Youth Unlimited Ride GO Card (Platinum Pass)	\$12.50
31-Day Unlimited Ride GO Card	\$70.00
31-Day Reduced Fare Unlimited Ride GO Card	\$35.00
Passport (unlimited rides during specified month-valid on all PSTA /HART routes)	\$85.00
Haul Pass (unlimited rides from May 15 th – August 31 st) (Youth Pass)	\$35.00
10-Day Transportation Disadvantaged Pass*	\$5.00
31-Day Transportation Disadvantaged Pass*	\$11.00
5-Day Medicaid Pass*	\$0.00
10-Day Medicaid Pass*	\$0.00
31-Day Medicaid Pass*	\$0.00
UPASS*	\$0.00
DEMAND RESPONSE SERVICE	
DART Cash Fare	\$4.50
DART 1-Ride Ticket	\$4.50
DART 10-Ride Punch Ticket	\$45.00
TD 1-Ride (Cash Only)	\$3.00
East Lake Shuttle (Cash Only, GO Cards not accepted)	\$2.25
BULK TICKET DISCOUNTS (501C3 Organizations)	
Purchase 100 -299	Save 5%
Purchase 300 or more	Save 10%

* Passengers must meet eligibility requirements. PSTA receives payment for these passes from the Commission for Transportation Disadvantaged for TD passes, Managed Care companies for Medicaid passes, and local agencies and organizations who provide UPASS privileges to their employees/students.

¹⁸ Premium fares for express routes have been removed from fare categories. Express routes fares are now the same as regular fares.

A fare is required for each trip; exact change, no pennies please.

GO Cards activate at time of insertion into the farebox (with the exception of the Passport), and expire at 11:59pm on the last day/last ride. Proper ID must be shown prior to paying a reduced fare or using a reduced fare GO Card. Youth passes require proper ID except for elementary age school children.

Reduced Fare ID Requirements

ID must be presented before using a reduced fare GO Card or paying a reduced cash fare.

- Youth (18 and younger) Need: PSTA Youth Photo ID, or School Student ID, or Government-issued Photo ID showing age. Valid for: Youth cash fare, 7-Day Platinum Pass and Summer HAUL Pass.
- Seniors (65 and older) Need: PSTA Special Citizen Photo ID, or Government-issued Photo ID showing age. Valid for: Reduced Cash fare, Reduced Daily and 31-Day GO Cards.
- Adult Student (Currently enrolled in a Pinellas County college, university, or adult education facility). Need: PSTA Adult Student Photo ID. Valid for: Student cash fare.
- Disabled (Qualifying disability verified via application process). Need: PSTA Special Citizen Photo ID. Valid for: Reduced cash fare, Reduced Daily and 31-Day GO Cards.
- Medicare Cardholders (Card issued by Federal Government). Need: Original Red/White/Blue Medicare Card. Valid for: Reduced cash fare, Reduced Daily and 31-Day GO Cards.

ATTACHMENT B: SENIOR/DISABLED FARES

Senior Special Citizen Program

This program allows passengers to ride PSTA's regular bus routes for a reduced fare by presenting PSTA Special Citizen Photo ID, or Government-issued Photo ID showing age. PSTA also accepts Photo ID cards from HART (Hillsborough Transit Authority) and PCPT (Pasco County Public -Transportation).

Passengers may show an original red/white/blue Medicare Card to ride for a reduced fare.

Disabled Special Citizen Program

This program allows eligible individuals to ride PSTA's regular bus routes for a reduced fare by presenting a PSTA issued photo ID Card upon boarding. Passengers wishing to take advantage of this program must fill out an application and have a doctor certify the disability. PSTA also accepts Photo ID cards from HART (Hillsborough Transit Authority) and PCPT (Pasco County Public Transportation).

The Federal Transit Act (Title 49 USC, Chapter 53, Section 5302) defines those who qualify as individuals who because of permanent illness, injury, congenital malfunction, or other incapacity (including an individual who is a wheelchair user or has semi ambulatory capability), are unable to utilize mass transportation service or a mass transportation facility without special facilities, planning, or design. Such limitations must present difficulty when waiting, boarding, riding, or exiting a public transit vehicle.

Financial need is not considered for program eligibility.

Special Citizen Fares

Special Citizen Reduced Cash fare:	\$1.10
Special Citizen Reduced Daily GO Card:	\$2.50
Special Citizen Reduced Monthly GO Card:	\$35.00
Special Citizen Reduced Premium/Express Cash Fare:	\$1.50

ATTACHMENT C: EAST LAKE SHUTTLE

The East Lake Shuttle serves northern Pinellas between Tampa and Keystone Roads, and is designed to connect with the Rt. 62 at the Shoppes of Boot Ranch. Reservations are required by 5 pm the day before service is needed, since same day service is not provided. Call 727-540-1897 (voice/relay) for cab or 727-540-1960 for wheelchair van reservations, and ask for the East Lake Shuttle. Reservations can be made Monday through Friday, 8 am until 5 pm and Saturday, Sunday and holidays from 9 am until 5 pm. Although reservations can be made on the weekends and holidays, the East Lake Shuttle operates Monday through Saturday only.

The shuttle fare is the same as the regular PSTA cash fare; PSTA GO Cards are not accepted on the shuttle. Shuttle passengers will be required to pay the appropriate fare when boarding Rt. 62. The East Lake Shuttle is a shared ride service provided on a first come, first served basis. Trips are scheduled to coincide with all bus trips on the Rt. 62. Pick up times are negotiated to maximize multi-loading.

ATTACHMENT D: DEMAND RESPONSE TRANSPORTATION (DART)

The Pinellas Suncoast Transit Authority (PSTA) provides demand response transportation for people who, because of their disability, are unable to independently use the regular, accessible PSTA buses. Demand response service is a form of public transportation. Passengers will be required to share a ride whenever possible, as is done on the regular bus system. PSTA is not required to ensure that a passenger rides alone on a vehicle.

The Americans with Disabilities Act (ADA) makes it possible for people with disabilities to have better access to the community. Eligibility for DART service is based on how a person's disability under ADA affects daily life activities which would prevent the use of accessible fixed-route service.

Demand response transportation is provided wherever regular PSTA bus service is available. Areas not included: Belleair Beach, Belleair Shores, Kenneth City, Tierra Verde, Weedon Island and any area outside a three-quarter mile distance of a regular bus route. Service area is subject to change. Service is not available outside Pinellas County. Demand response transportation is available during the same days and hours as the regular bus service for any given trip request. Where architectural barriers such as lack of curb cuts or sidewalk are the only impediment to using accessible buses, an individual may be transported to a bus transfer point where an accessible bus can be boarded.

Fare Information:

- Reservations are required by 5 pm the day before service is needed, since same day service is not provided.
- Call 727-540-1897 (voice/TTYT) for cab or 727-540-1960 for wheelchair van reservations.
- The fare for demand response transportation is \$4.50 per one way trip, upon boarding the vehicle.
- Exact fare is encouraged; change will be made for a \$5.00 bill.
- No discounts are offered.
- Convenient frequent-rider tickets are available, but may need to be supplemented when a higher fare is necessary for a particular trip.
- Checks and credit cards are not accepted unless you are purchasing a multi-ride ticket either online or through PSTA's Tickets by Mail Program.

ATTACHMENT E: TRANSPORTATION DISADVANTAGED PROGRAM

The Pinellas County Transportation Disadvantaged (TD) Program is administered by the Pinellas Suncoast Transit Authority (PSTA). The TD program is a state-funded program that provides reduced cost transportation throughout the county to residents who qualify as "Transportation Disadvantaged."

In order to qualify for Transportation Disadvantaged services In Pinellas County, a person must:

- Live in Pinellas County
- Not be able to get a ride from household members or others for life-sustaining trips: medical, grocery, work, job-related training/education, and other vital services
- Have documented household income which does not exceed 150% of poverty (see chart below)

2020 Federal Poverty Guidelines (X 150%):

Family Size	Gross Yearly Income	Gross Monthly Income
1	\$19,140	\$1,595
2	\$25,860	\$2,155
3	\$32,580	\$2,715
4	\$39,300	\$3,275
5	\$46,020	\$3,835
6	\$52,740	\$4,395
7	\$59,460	\$4,955
8	\$66,180	\$5,515
For each additional person	+\$6,270	+\$560

Individuals able to access and ride a bus can qualify for either a 10 (non-consecutive) Day bus pass for \$5.00 per month, or a 31-Day unlimited ride bus pass for \$11 per month. The passes can be used for travel to any location served by the PSTA bus system, with the exception of the 100X and 300X express routes.

Individuals who DO NOT receive a bus pass will receive transportation via taxi or wheelchair van for \$3.00 per one-way trip. The fee is due in cash at the time of the ride. Reservations must be made 48 hours in advance.

If approved for a TD bus pass, the individual will need to bring a government-issued photo ID to a PSTA Customer Service Center once per month. In addition, the individual will need to bring cash or credit/debit to purchase their pass:

- **10-Day Pass:** \$5.00
- **31-Day Pass:** \$11.00

If approved for door-to-door service, the individual will need to make trip reservations directly with the sedan or wheelchair van contractor for eligible trip purposes approved within Pinellas County. Payment of \$3.00 cash for each one-way trip MUST be given to the driver at the time of pick-up.

Pass distribution may be limited based on available funding.

Sedan or wheelchair van transportation is only provided when it is determined to be the most appropriate mode. For example, if a person is unable to use the bus system due to a verifiable physical or mental disability.

TD is an equal opportunity program which complies with Title VI of the Civil Rights Act as amended.

ATTACHMENT F: MEDICAID PROGRAM

PSTA sells Medicaid bus passes to Medicaid transportation brokers, who provide them at no cost for eligible Medicaid beneficiaries to get to and from their eligible Medicaid appointments. PSTA sells Medicaid passes at regular far price.

ATTACHMENT G: BULK TICKET PURCHASES

501(C)(3) and Government Organization Purchases

PSTA offers a bulk ticket purchase program for 501(C)(3) or governmental organizations. This program grants a 10 % discount on ticket purchases of 200 or more of the same type of ticket, with the exception of Single Ride passes in which a purchase of 300 or more is needed to qualify for the discount. An organization is required to submit a Consumer Certificate of Exemption for discounts. If an agency is not a 501 (C) (3) or governmental agency, then there is no discount of any kind for the purchase of bulk tickets.

PSTA accepts checks, money orders or cash for bulk ticket purchases, and payment is due when the tickets are picked up. There are certain restrictions/criteria regarding certain passes; please call PSTA for further information.

For TD or Medicaid pass bulk purchases, please contact PSTA's Mobility Manager for requirements.

Third-Party Outlets

PSTA uses a number of merchants such as AMSCOT, CVS and a variety of others as third-party ticket outlets. Depending on the type of contract the merchant has with PSTA, it receives a commission or discount of 5% – 10% on orders. In general, outlets sell Unlimited Daily and Unlimited Daily Reduced GO Cards, 31 Day Unlimited and 31 Day Reduced GO Cards, 7 Day Unlimited GO Cards and the Youth Platinum Passes. Photo IDs are not required to purchase these passes; however, some passes are restricted and an official ID must be shown when boarding the bus.

ATTACHMENT H: UNIVERSAL PASS- (UPASS) (CONTRACTED)

PSTA provides a program whereby an organization can pay a lump-sum dollar amount for unlimited rides on the PSTA fixed route (bus) system for its employees or students. This includes the 100X and 300X express routes; the East Lake Shuttle is excluded. The Jolley Trolley and the St. Petersburg Trolley (Looper) are included in this program. Riders must show a valid participating organization ID upon boarding the bus or trolley.

For further information, please contact PSTA.

Note: DART Services are exempt from this program.

APPENDIX I: 2017 Title VI Program Update – FTA Comments



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION 4
Alabama, Florida,
Georgia, Kentucky,
Mississippi, North
Carolina, South Carolina,
Tennessee, Puerto Rico,
and the US Virgin Islands

230 Peachtree, NW Suite 1400
Atlanta, GA 30303

September 30, 2019

Brad Miller, General Manager
Pinellas Suncoast Transit Authority, Clearwater PSTA, Recipient ID: 1080
3201 SCHERER DR N
SAINT PETERSBURG, FL 33716

Re: Triennial Title VI Program Update

Dear Brad Miller, General Manager,

The Federal Transit Administration (FTA) has received and reviewed Pinellas Suncoast Transit Authority, Clearwater PSTA's initial Title VI program submitted on 12/1/2017. This Title VI program will be effective until November 30, 2020. The Department of Transportation (DOT) requires recipients of DOT funds to demonstrate compliance with Title VI of the Civil Rights Act of 1964 through regular compliance reports. The Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Grantees" sets forth the information that should be included in these updates, and requires they be submitted as Title VI Programs submitted every three years.

FTA's review of your Title VI program considered all elements required by the Department of Transportation regulations found at 49 C.F.R. § 21, as outlined in Circular 4702.1B. The Review Assessment attached to this letter identifies the specific areas reviewed, any concerns, and relevant reviewer comments. To assure you are implementing Title VI program requirements in accordance with the regulations, you must promptly address and correct any concerns identified with a "no" in the Review Assessment. Your program status is now *Concur*. ***Please note that your next triennial Title VI program submission was due to FTA is due by no later than December 1, 2020.*** Please retain documentation as needed to demonstrate the corrections noted have been addressed. FTA typically verifies corrections have been made and implemented at the next oversight opportunity, but can request this information at any time.

For Everyone: Your Title VI program demonstrates your agency has the procedures and resources to ensure public transportation services are provided in a nondiscriminatory manner, as required by Title VI of the Civil Rights Act of 1964. FTA's review and concurrence on a Title VI program does not relieve recipients from the requirements and responsibilities outlined in Circular 4702.1B or of the DOT Title VI regulation at 49 CFR part 21. You must properly implement your program to ensure nondiscriminatory service, including full and fair participation in public transportation decision-making, and meaningful access to transit-related programs and activities by persons with limited English proficiency. If you use contractors or have subrecipients, you must monitor their compliance with Title VI. You can find these

monitoring responsibilities in Chapter 2, Section 6 (Contractors) and Chapter 3, Section 12 (Subrecipients) in the FTA Title VI Circular. As a basic requirement for Title VI compliance, you must develop a language assistance plan (LAP). Your LAP must include a Four Factor Analysis—you can find information on this analysis in Chapter 3, Section 6 of the FTA Title VI Circular. If you believe that your agency only serves an English-speaking population, you still must complete a Four Factor Analysis to demonstrate this.

For 200/50 Recipients: Prior to implementing any major service changes or any fare change, transit agencies operating more than 50 vehicles in large urbanized areas must complete an equity analysis, and submit it for board review and approval. You can find more information on SAFE Analyses in Chapter 4, Section 7 of the FTA Title VI Circular. Large transit agencies must also collect and report demographic data, including data gathered through rider surveys, and monitor transit service relative to system-wide service standards and service policies. If you need technical assistance with your Service and Fare Equity (SAFE) Analysis, please contact your Regional Civil Rights Officer.

For State DOTs: Your Title VI program must include a demographic profile of your state that includes the locations of minority populations. You must also submit additional data and information as outlined in Chapter 5, Section 2 of the FTA Title VI Circular. If you pass through funds to any Metropolitan Planning Organizations (MPO), then you must collect Title VI programs from them on a schedule that you determine.

For MPOs: Your Title VI program must include a demographic profile of your metropolitan area that includes the locations of minority populations. You must also submit additional data and information as outlined in Chapter 6, Section 2 of the FTA Title VI Circular. FTA is committed to providing technical assistance to help correct your Title VI program and to implement your program consistent with the regulations and guidance.

FTA is committed to providing technical assistance to help correct your Title VI program and to implement your program consistent with the regulations and guidance. In order to preserve paper, we are issuing this letter electronically via email and it is attached to your profile in TrAMS. In the attached document, you will see the results of your Title VI Program Review. Please do not hesitate to contact me directly at 404-865-5639 or at sarah.majdiak@dot.gov if you have any questions or would like to talk further about Title VI or any of your other Civil Rights programs.

Sincerely,

Sarah Majdiak/s/
Civil Rights Officer, Region 4

cc: Yvette G. Taylor, FTA Region 4, Regional Administrator
Monica McCallum, FTA Civil Rights, Director of Regional Operations

Title VI Program Review Assessment:

Items below identified as “YES” are included in the Title VI program review, and no changes are needed. Items identified as “NO” were not included or were insufficient and must be corrected. Carefully address all insufficient items, as indicated in this review letter, to ensure you are implementing your Title VI program in accordance with the regulations.

Chapter 3: GENERAL REQUIREMENTS AND GUIDELINES

Does the program submission include appropriate documentation demonstrating that the transit board of directors has approved the Title VI program? *Yes*

Public Notice

Does the submission include a copy of the public notice informing the public of the protections against discrimination afforded to them under Title VI? *Yes*

Is there a list of public locations where the notice is posted? *Yes*

Did you verify the notice is posted on the agency’s website and in public areas of the agency’s offices? *Yes*

Does the public notice include how to request additional information on your Title VI obligations? *Yes*

Does the public notice include how to file a complaint? *No*

Complaint Procedures

Did you include the (internal to the agency) procedures for investigating and tracking Title VI complaints filed against them? *Yes*

Did you include the instructions it gives to members of the public about how to file a Title VI discrimination complaint? *Yes*

Are the procedures for filing a Title VI discrimination complaint available on the agency website? *Yes*

Complaint Form

Does the program include a copy of the complaint form that specifies the three classes protected by Title VI (race, color, and national origin)? *Yes*

Is the complaint form available on the agency’s website? *Yes*

Did you include a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and/or complaints naming the recipient? *N/A - no complaints received*

Public Participation Plan

Did you include a Public Participation Plan that describes the proactive strategies, procedures, and desired outcomes of public participation activities? *Yes*

Does the Public Participation Plan include information on how the grantee considers the needs of, and engages minority and LEP populations in public participation activities? *Yes*

Did you summarize the public outreach and involvement activities undertaken in the last 3 years? *No*

Board Selections

Did you select members to transit-related, non-elected planning boards, advisory councils or committees? *No - No non-elected boards*

If you select members, did you provide a table with a racial breakdown of the membership of those boards, councils, or committees? *Not Included*

Did you describe how they encourage minorities to participate on these boards, councils, and committees? *Not Included*

Subrecipient

Does the program indicate if you have subrecipients? *No - No subrecipients*

If you have subrecipients, did you provide the monitoring procedures and/or efforts you use to ensure subrecipients comply with Title VI? *Not Included*

Did you describe the process used to provide assistance to subrecipients, when needed? *Not Included*

LEP Four-Factor Analysis & Plan

Did you include a Language Assistance Plan? *Yes*

Does the Language Assistance Plan include a Four-Factor Analysis that determines the appropriate level of LEP assistance and outreach efforts needed? *Yes*

Did your Language Assistance Plan NOT include something? *Not Included*

Facility Site Equity Analysis

Did you identify a site or location for a new facility (excluding bus shelters) or construct a facility during the period covered by your program? *No*

Did you complete and submit an equity analysis conducted during the planning stage for all projects requiring land acquisition and the displacement of persons from their residences and businesses? *Not Included*

Did the site analysis include outreach to persons potentially impacted by the siting of facilities? *Not Included*

Did the site analysis compare the equity impacts of alternative locations prior to selecting the preferred site? *Not Included*

Did you give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result? *Not Included*

Did you determine that the location of the project will result in a disparate impact on the basis of race, color, or national origin? *Not Included*

Did you provide a substantial legitimate justification for the project location? To do so, you must demonstrate that either 1) no alternative locations are available, or 2) any alternative locations, if identified, would result in the same or more disparate impact on the basis of race, color, or national origin. *Not Included*

Chapter 4: FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

Service Standards

Did you include your service standards and policies for each specific fixed route mode of service you provide? *Yes*

Which service standards, if any, are NOT included? *Vehicle load for each mode*

Service Policies

Are the current service policies included? *Yes*

Is there a description of how service policies are adopted to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin? *Yes*

Which service policies, if any, are NOT included? *Not Included*

Large Urbanized Fixed Route Requirements

Demographic Data

Are demographic and service profile maps and charts (demographic data) included? *Yes*

Is the demographic data current as of the most recent decennial census or American Community Survey? *Yes*

Does the program include a description of how demographic data is prepared prior to proposed service reductions or eliminations? *Yes*

Does the demographic data include a base map of the transit service area? *Yes*

Does the base map include overlays of the required data? *Yes*

Do the demographic maps appropriately identify areas where the minority population exceeds that of the service area as a whole? *Yes*

Do the demographic maps appropriately identify areas where the low-income population exceeds that of the service area as a whole? *Yes*

Ridership Surveys

Do you collect demographic ridership and travel patterns using customer surveys? *Yes*

Which requirements of the ridership and travel pattern surveys are NOT met, if any? *Not Included*

Monitoring

Do you include the results of monitoring service standards and policies? *Yes*

Which required transit monitoring methods are NOT included, if any? *Not Included*

SAFE Analysis

Did you include the written policies and procedures for your service and fare equity analyses process? *Yes*

What required service and fare equity analysis policies or procedures are missing, if any? *A copy of board meeting minutes or resolution demonstrating the board's consideration*

awareness - and approval of the major service change policy - disparate impact policy and disproportionate burden policy

Did you identify any service and/or fare equity analyses from the last 3 years? *Yes*

Did you include the results of the service and/or fare equity analyses conducted in the last 3 years? *Yes*

If there were service and/or fare equity analyses conducted in the last 3 years, what required documentation is NOT included, if any? *A board resolution copy of meeting minutes or similar documentation as evidence of the board or governing entity or official's consideration awareness and approval of the analysis*

FTA Reviewer Comments:

I was not able to locate a summary of the Title VI/LEP targeted the public outreach and involvement activities undertaken during the reporting period. Please update you 2020 Title VI Report to include this.

I was not able to locate your vehicle load for each mode in your service standards. Your Appendix A provides assurances of what you will do but the actual data is not provided in the report in your Service Monitoring Section. (Chapter IV-5 and Appendix G)

I was not able to locate a signed copy of board meeting minutes or resolution demonstrating the board's consideration awareness and approval of the major service change policy - disparate impact policy and disproportionate burden policy. There was a draft copy that was unsigned in Appendix G. Please update this.

The Methodology for your Service Equity Analysis in Appendix H did not make it entirely clear how you reached your conclusions in the tables provided in 1A-3A. Since these service changes have already been approved and implemented we would encourage you to seek out technical assistance prior to your next submittal.

Also, please visit the FTA Civil Rights webpage for more information:

<https://www.fta.gov/civil-rights>

PSTA has responded to the following FTA Reviewer Comments in the 2020 Title VI Program Update:

I was not able to locate a summary of the Title VI/LEP targeted the public outreach and involvement activities undertaken during the reporting period. Please update you 2020 Title VI Report to include this.

PSTA added a summary of outreach and involvement activities during this reporting period in Section 1-5.

I was not able to locate your vehicle load for each mode in your service standards. Your Appendix A provides assurances of what you will do but the actual data is not provided in the report in your Service Monitoring Section. (Chapter IV-5 and Appendix G)

PSTA added an analysis of vehicle load in Section 2-5. Load information by route is shown in Table B-4 in Appendix B.

I was not able to locate a signed copy of board meeting minutes or resolution demonstrating the board's consideration awareness and approval of the major service change policy - disparate impact policy and disproportionate burden policy. There was a draft copy that was unsigned in Appendix G. Please update this.

PSTA has included the meeting minutes from the January 2018 PSTA Planning Committee and Board meetings demonstrating approval of the previous program update. PSTA will submit updated board approval documentation following the January 2021 PSTA Board meeting.

The Methodology for your Service Equity Analysis in Appendix H did not make it entirely clear how you reached your conclusions in the tables provided in 1A-3A. Since these service changes have already been approved and implemented we would encourage you to seek out technical assistance prior to your next submittal.

PSTA added a table in Appendix H that demonstrates how the results shown in service equity analyses are calculated in the Remix software.